

AENC-NG-CNS-REP-0380

Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.27 Response to Category 1 and 2 Affected Persons
Objections**

Final Issue A

July 2026

Planning Inspectorate Reference: EN020027

nationalgrid

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1.1 Overview

- 1.1.1 This document forms the explanatory preface to **8.27 Response to Category 1 and 2 Affected Persons Objections Schedule (Tracker)**, submitted at Deadline 7 for the Norwich to Tilbury project (hereafter ‘the Project’).
- 1.1.2 This document constitutes the Applicant’s response to the Rule 17 letter dated 18 June 2026 [**PD-028**], with the submitted response reflective of the additional instructions and clarifications provided by the Examining Authority at the conclusion of Issue Specific Hearing 4 on 25 June 2026.
- 1.1.3 Whilst the Applicant has sought to comply with all aspects of the Examining Authority’s Rule 17 Letter, it has become apparent in doing so that inherent technical limitations within the functionality of Microsoft Excel mean that it is a software format which is unsuitable for capturing the detailed written submissions which the Applicant has sought to prepare in response to each of the submitted objections.
- 1.1.4 The Applicant has therefore prepared the Tracker as a fully navigable Microsoft Word document in anticipation that it may be read alongside the **8.14 Schedule of affected persons objecting to CA or TP of their lands or rights** and in a manner which more readily enable the Examining Authority and all Affected Persons (APs) to review the Applicant’s responses to the submitted objections. The Applicant trusts that the format adopted for the Tracker will facilitate efficient examination of the matters raised and support consideration of the issues in dispute.
- 1.1.5 At this point, it is worth reiterating that whilst the Tracker presents the Applicant’s current position in response to the objections raised by Category 1 and Category 2 Affected Persons, the Applicant remains committed to engaging proactively and constructively with all Affected Persons throughout the remainder of the Examination and, where necessary, following the close of Examination, with a view to narrowing areas of disagreement, progressing negotiations, and seeking to resolve objections through voluntary agreement wherever reasonably practicable. Further supporting detail is set out in Annex B of **8.5.10 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 (Final Issue A) [REP6-116]**.

1.2 Navigating the Document

- 1.2.1 This document contains the latest **8.27 Response to Category 1 and 2 Affected Persons Objections Schedule (Tracker)** which features an additional column: “Applicant’s Response”. Under this column, for each AP, a text embedded navigable link directs to the relevant table within Appendix A of the document.
- 1.2.2 Appendix A contains all of the AP objections submitted at Deadline 5A and the Applicant’s response in a series of unique tables for each AP.
- 1.2.3 For each AP, the left-hand column in Appendix A records the AP’s verbatim objection as submitted at Deadline 5A.
- 1.2.4 The right-hand column contains the Applicant’s response, including:
- a summary of the AP’s objection;

- details of the land and other interests held by the AP within the Order Land and the land, rights and/or powers of temporary possession sought to be acquired or exercised by or on behalf of the Applicant;
- replies to AP-specific concerns (including, where relevant, responses provided by UKPN); and
- thematic responses where issues are common across multiple APs (noting that the inclusion of thematic text within responses to individual AP objections reflects the Examining Authority's clear instruction that the Applicant should ensure that each response should be capable of being read in isolation).

1.2.5 A fully navigable Table of Contents is included at the start of Appendix A . Each main heading in the Table of Contents contains the AP number and Name, and sub-heading for the respective response table, titled with the PIL Reference ID number.

1.2.6 Where an objection contains limited detail, the Applicant has sought to assist the Examining Authority by providing a response informed by previous engagement with the relevant AP. This approach is intended to ensure that issues previously raised during discussions and correspondence are addressed holistically, notwithstanding the absence of detailed supporting information within the objection itself.

1.3 Reason for the Format

1.3.1 Due to the extent, complexity and volume of information required to sufficiently respond to the APs, many entries exceed Microsoft Excel's visible-field character limit; this is a limitation of Excel.

1.3.2 Microsoft Excel is primarily designed to carry out complex calculations, present large amounts of numerical information, manipulate data and produce numerically associated visualisations such as pie charts.

1.3.3 Conversely, Microsoft Word is designed to present tables with rich text formatting in visually accessible layouts.

1.3.4 Attempts to present the responses in Excel compromised readability and formatting integrity for individual AP entries and the Applicant's responses. Introducing additional lines or using filters further affected the document's structure.

1.3.5 In addition, the file size when using Excel made the document difficult to read, navigate and use, and materially reduced performance.

1.3.6 The Applicant has therefore prepared the material in Microsoft Word, which allows faster navigation and improved presentation of the requested information.

NORWICH TO TILBURY PROJECT EN020027: SUMMARY OF RESPONSES TO RULE 17 1 JUNE 2026

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Michael John & Christine Clews	9917 10067	Yes	Temporary possession;Compulsory Acquisition of rights;	All	Both	The proposed terms provide wide ranging rights and powers to NG, and impose significant restrictions on our use of our land, both during the option period and into perpetuity. When discussing the land use with Fisher German LLP, they indicated that NG does not intend to construct anything on our land and the proposed agreement is to enable temporary access to facilitate the construction of the proposed power line. They also indicated that this access probably would not be needed but is being sought as a precautionary measure. The area of our land is only one acre. NG seeks rights over two tranches of land, one in the middle and one at the Eastern end of our land, this would significantly reduce the useable area of our land. Granting NG such rights would be a blight on our land that renders it practically unusable and unsellable. We believe it would be more appropriate for the terms to reflect the intended purpose rather than grant wide ranging and unnecessary powers, just in case. In principle, we do not object to granting NG temporary access, if required, to facilitate construction but, we do not believe it appropriate to grant rights allowing towers to be permanently installed on our land, or oversail, when Fisher German LLP say this is not intended. We are prepared to consider terms that better reflect the intended use of our land.	See Appendix A: AP 1 - Michael John & Christine Clews
Janet Lesley Masterson	4757	Yes	Compulsory Acquisition of land ;Compulsory Acquisition of rights	All	Both	Because this is MY land, my property.	See Appendix A: AP 2 - Janet Lesley Masterson
Frances Williams	8663	Yes	Compulsory Acquisition of land		Both		See Appendix A: AP 3 - Frances Williams
Catherine Judith Chamaud (as director of Westlands Farm Developments Ltd)	15364	Yes	All of the above	All	Both	Failure of NG and UKPN to recognise the impact of their proposals on the proposed residential development at Lynton, and the lack of any meaningful engagement with the land owner and developer, to resolve technical and design issues in a way that is commercially viable to all parties.	See Appendix A: AP 4 - Catherine Judith Chamaud (as director of Westlands Farm Developments Ltd)
Nicholas Dent	5156	Yes	Temporary possession;Compulsory Acquisition of rights;Compulsory Acquisition of land ;All of the above	All	Both	I don't want my land destroyed,hedges being removed and trees.dont want the disruption and I will have land impossible to farm and I don't want bullying by ng	See Appendix A: AP 5 - Nicholas Dent
Martin Baxter	6777	Yes	All of the above	My home address	Both	I object	See Appendix A: AP 6 - Martin Baxter
David Robert Miles	2692	Yes	All of the above	All	Both	The Pylon Line goes through an area of the farm that has been in an Environmental Scheme for a number of years, and all the good things that we have achieved for the environment, bird numbers and wildlife in general, will be decimated	See Appendix A: AP 7 - David Robert Miles
Sheila Miles	28376						Seeila Miles
Gareth Pressley	13564	Yes	All of the above	ALL	Both	My property is not your standard empty field or farm land. We are a small holding and we have animals for meat which we breed ourselves. We grow fruit and veg, make our own compost, We have bee's for honey and so much more. National grids project and use of our land will decimate it, we have cable towers and nets, haul roads and drainage, all spread out over the entirety of our 4 acres. Simply put they will destroy our families way to feed itself and much more. There is no regard for green space, nature, animals or peoples mental health. We have been threatened on our doorstep by representatives, and have had meetings with more people than we can count and every time is a different person, different plan amounting to the same thing, and different contradictory information, even the plans submitted to the authorities are different to what we received with basic heads of terms. Its farcical and purposefully mis directional.	See Appendix A: AP 8 - Gareth Pressley
Robert James Capps	15838	Yes	Compulsory Acquisition of land ;Compulsory Acquisition of rights;All of the above;Temporary possession	All	Both	I own the house. No idea where you want to access as you haven't told me	See Appendix A: AP 9 - Robert James Capps
Matthew Gementera	15953	No					See Appendix A: AP 10 - Matthew Gementera
Joel Woolf	1918	Yes	All of the above	All	Both	The proposed right take around the headlands and not the centre but remove access to the centre during works. This is unacceptable and sterilises the entirety to my land because the proposal is to take the only access into the remaining land	See Appendix A: AP 11 - Joel Woolf
Antony Francis Goddard	3302	Yes	All of the above	All	Both		See Appendix A: AP 12 - Antony Francis Goddard
Trevor George Musk	6377	Yes	All of the above	All	Both		See Appendix A: AP 13 - Trevor George Musk
Linda Jane Goddard	3980	Yes	All of the above	All	Both		See Appendix A: AP 14 - Linda Jane Goddard
Ann Dent	2652	Yes	All of the above;Temporary possession;Compulsory Acquisition of rights;Compulsory Acquisition of land	All	Both	Sick of all of it,don't want my farmland ruined or hedges and trees removed	See Appendix A: AP 15 - Ann Dent

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Georgina Sally Green	4862	Yes	Compulsory Acquisition of land ;Compulsory Acquisition of rights;Temporary possession;All of the above	All	Both	We farm this land and the construction of the pylons will make it much harder to farm with agricultural machinery. Once the pylons are installed there may be areas of land that are too small to be economically farmed.	See Appendix A: AP 16 - Georgina Sally Green
Bernard William Green	4679	Yes	All of the above	All	Both	We farm this land and the construction of the pylons will make it much harder to farm with agricultural machinery. Once the pylons are installed there may be areas of land that are too small to be economically farmed.	See Appendix A: AP 17 - Bernard William Green
Gillian Leeks /Malcolm Leeks	2596 4478	Yes	All of the above	ALL	Both	We object to any compulsory purchase or any interference with our land on the basis it's our privately owned land and we do not want pylons buzzing interfering with the peace of the countryside. This is why we purchased the land. It's our right as landowners to protect the countryside.	See Appendix A: AP 18 - Gillian Leeks /Malcolm Leeks
Mark Ian Hoskin	14202	Yes	Compulsory Acquisition of land ;Compulsory Acquisition of rights;Temporary possession;All of the above	B-1/13 B-1/14	Both	We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid. The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us. In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued. Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.	See Appendix A: AP 19 - Mark Ian Hoskin
Helen Phillips	6457	Yes	All of the above	All	Both	I object to the installation of 7 pylons in such a small village, encroaching on the landscape and wildlife, also on a personal level. There will be major disruption around this build and the landscape will never be the same	See Appendix A: AP 20 - Helen Phillips
Jane Wendy Betts Jane Betts. Also as representative to the estate of John Gavin Betts (deceased) of same address.	9143 28095	No					See Appendix A: AP 21 - Jane Wendy Betts Jane Betts. Also as representative to the estate of John Gavin Betts (deceased) of same address.
Amy Frances Travell	14201	Yes	All of the above	B-1/13 B-1/14	Both	We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid. The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us. In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued. Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.	See Appendix A: AP 22 - Amy Frances Travell

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Oak Farm Lodges	14201 14202	Yes	Compulsory Acquisition of land ;All of the above;Temporary possession;Compulsory Acquisition of rights	B-1/13 B-1/14	Both	We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid. The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us. In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued. Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.	See Appendix A: AP 23 - Oak Farm Lodges
Paul Edmund Baker (also representing the Estate of E Hudson Baker and Mabel Anne Baker)	3085 rep 5262 14920	Yes	All of the above	All plots in our freehold and occupation	Both	No direct consultation after planned route changed to impacting our interests	See Appendix A: AP 24 - Paul Edmund Baker (also representing the Estate of E Hudson Baker and Mabel Anne Baker)
Alison Taylor	6078	Yes	All of the above	All	Both		See Appendix A: AP 25 - Alison Taylor
David Robert Miles	2692	Yes	All of the above	All	Both	For many years we have been involved with environmental schemes to enhance wildlife in the area that the pylons will be removed and built. We have seen substantial benefit from this, especially with small birds. This scheme will undo all the good that has been achieved over the years	See Appendix A: AP 26 - David Robert Miles
Andrew Bendall	1625 7256	Yes	Compulsory Acquisition of rights,Temporary possession,Compulsory Acquisition of land,All of the above	N-T_LIQ_18289	Both	The lane we use to access our property is used frequently and any loss of access is not acceptable. Disturbance by increased amount of traffic would adversely affect the quiet location and also upset our dogs who are reactive to traffic on the lane.	See Appendix A: AP 27 - Andrew Bendall
Rachel Perry James Perry	7645 7033	Yes	All of the above	All	Both		See Appendix A: AP 28 - Rachel Perry James Perry
Paul Whittle	2599	Yes	All of the above	All	National Grid	National Grid have not responded to any of our concerns. Why should we help them if they continue to not listen?	See Appendix A: AP 29 - Paul Whittle
Jonathan Cole-Matthews / John Cole Farms Limited	10187	Yes	All of the above	All	Both	It is an infringement of our private property rights. Compensation would not reflect the international loss of valuable land	See Appendix A: AP 30 - Jonathan Cole-Matthews / John Cole Farms Limited
Victoria Owen	561	Yes	All of the above	All	Both	Please refer to my agent, E. Havers at Clarke and Simpson Ltd.	See Appendix A: AP 31 - Victoria Owen
William John Gray	1115						See Appendix A: AP 32 - William John Gray
Sam Taylor	10337	Yes	All of the above	All F-7/5 (Section F Sheet 7)	Both	The land in question is a former infilled quarry; our surface ownership is covered under EX834408. Holcim is referred to in the document as 'Lafarge International Holdings'. The former quarry was infilled with landfill and as such requires ongoing gas monitoring to comply with the EA landfill permit. To complicate matters, all access rights have been granted to 'Lafarge Aggregates Limited' (which is Tarmac) to infill, extract landfill gas and undertake any works necessary for landfill management under the EA permit. Therefore, we cannot agree to a unilateral arrangement or anything that will impede the rights granted to 'Lafarge Aggregates Limited' (Tarmac).	See Appendix A: AP 33 - Sam Taylor
Ian James Colchester	3229	Yes	All of the above	ALL	Both		See Appendix A: AP 34 - Ian James Colchester
Nemone Braithwaite	4830	Yes	All of the above	All	Both	The land is a nature reserve	See Appendix A: AP 35 - Nemone Braithwaite
Brian James Floringer	4865	Yes	All of the above	All	Both	All of our land is used for grazing by our horses and we cannot disrupt or reduce their food supply, or risk granting access	See Appendix A: AP 36 - Brian James Floringer
Martin Richard Mountfort	3180	Yes			Both	FP 105141-008 Seven Acre Field at Dunton (Sole Ownership) Also shown on your National Grid Drawing NG-NT-2025-06-GF-CON-R3-1481 N-T-LIQ-18833 OS Map Ref TQ 65 90 (part ownership with Justin Samuel Mountfort and Verity Collins) [REDACTED]. Presence of High Voltage Overhead Lines will devalue property. Construction work will damage Gateways and land surfaces(topsoil will be lost or mixed into deeper clay)	See Appendix A: AP 37 - Martin Richard Mountfort
Jonathan James Nelson	9614	Yes	Compulsory Acquisition of rights,Temporary possession,Compulsory Acquisition of land,All of the above	All	Both	This work will create a negative financial effect on house value, will cause disruption and environmental damage to where we live, and will cause inconvenience to our everyday lives and our ability to walk the surrounding area.	See Appendix A: AP 38 - Jonathan James Nelson
Katherine Ann Nelson	6668	Yes	All of the above	all	Both	this will cause severe inconvenience , have a negative effect on our house value, make it more difficult to be able to use the surrounding area for physical activity and for exercising dogs. It will scare away wildlife such as barn owls, bats and many more.	See Appendix A: AP 39 - Katherine Ann Nelson
Andrew Donald Smith	3398	Yes	All of the above	All	Both	We have an agent working on our behalf to make an agreement with National Grid and UK Power Networks so that CA and TP should not be necessary.	See Appendix A: AP 40 - Andrew Donald Smith
Claire Tebbutt	13638	Yes	All of the above	All	Both		See Appendix A: AP 41 - Claire Tebbutt
KEVIN WILLIAM TEBBUTT	13637	Yes	All of the above	All	Both		See Appendix A: AP 42 - KEVIN WILLIAM TEBBUTT

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Juliet Francis	14957	Yes	All of the above		Both	I wholeheartedly oppose the entire scheme and object to the enormous loss of value the scheme has had on my property, as well as the huge detrimental environmental impact. I have been unable to sell the field a pylon will be sited on and this is causing me to have to sell my entire small farm and home of 30 years. My husband died in December 2025, hugely troubled by the prospect of us having to sell the farm because no one will buy a field which is due to have the enormous disruption of a pylon being constructed. We have previously sold land very successfully to maintain our life here on the farm and that field is the only one remaining to sell whilst keeping the heart of the farm intact.	See Appendix A: AP 43 - Juliet Francis
Stephen March, Jane March and The Trustees of the Foljambe 1984 Settlement	2550, 3717, 6103, 9438	Yes	All of the above	All	Both	Our objections to how this project would interfere with our land are twofold. There is the loss of use of the land and the impact on our business with a reduced acreage and the environmental damage that will be caused by the removal and stacking of soil for the haul roads and the trenching. The stacking of the topsoil will destroy the microbe and organic content of the soil as well as the drainage capability when returned to the field. As three parcels of land are permanent pasture, the effect will be greater as this will not return to what it is for many years. Especially the land in Fordham Valley where the land is ridge and furrow and provides Summer and Winter grazing. This land will lose its stock carrying capacity and productivity completely. The three areas of grassland will have a big impact on our competition horse breeding and beef rearing as we would have insufficient grass land to graze the animals and conserve winter forage.	See Appendix A: AP 44 - Stephen March, Jane March and The Trustees of the Foljambe 1984 Settlement
Clive Bainbridge	59	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,All of the above,Temporary possession	All	Both	Desecration old hedgerows and trees. Violation private land and loss of privacy.	See Appendix A: AP 45 - Clive Bainbridge
Ellena Benton	29427	Yes	Compulsory Acquisition of rights,Compulsory Acquisition of land	All		Object	See Appendix A: AP 46 - Ellena Benton
Laura Lennox	777	Yes	All of the above	ALL	Both	The Heads of Terms are not satisfactory and NG / UK Power Networks are not engaging with the relevant bodies /land agents in a constructive manner to resolve landowner issues.	See Appendix A: AP 47 - Laura Lennox
Stuart Paris	7304	Yes	All of the above	ALL	Both	The Heads of Terms are not satisfactory and NG / UK Power Networks are not engaging with the relevant bodies /land agents in a constructive manner to resolve landowner issues.	See Appendix A: AP 48 - Stuart Paris
Brian John Faulkner	9339	Yes	All of the above	F-10/50	Both	Pylon TB180 at Handley Green The proposed pylon TB180 will be alongside the access road from Handley Green to our property which is the only property on this road. It is a cul-de-sac, an unmade dirt road and is our only access in and out of our property. We therefore need access 24/7. We object to any change which affects our access. If National Grid or UKPN are to use this track they must ensure our access is freely available during any construction and maintenance work. The road into Handley Green and the dirt road to Marshalls Farm and Annexe are single track and unsuitable for large and/or heavy vehicles and National Grid will need to resurface and maintain the roads.	See Appendix A: AP 49 - Brian John Faulkner
Usha Faulkner (nee Rao)	7661	Yes	All of the above	F-10/50	Both	Pylon TB180 at Handley Green The proposed pylon TB180 will be alongside the access road from Handley Green to our property which is the only property on this road. It is a cul-de-sac, an unmade dirt road and is our only access in and out of our property. We therefore need access 24/7. We object to any change which affects our access. If National Grid or UKPN are to use this track they must ensure our access is freely available during any construction and maintenance work. The road into Handley Green and the dirt road to Marshalls Farm and Annexe are single track and unsuitable for large and/or heavy vehicles and National Grid will need to resurface and maintain the roads.	See Appendix A: AP 50 - Usha Faulkner (nee Rao)
Elizabeth Xenakis	7345	Yes	All of the above	All	Both	Ruin the countryside	See Appendix A: AP 51 - Elizabeth Xenakis

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Stephen Paul Goulding	3931	Yes	All of the above	All	Both	I object to the proposed interference with my land and private rights arising from the Development Consent Order. My land is approximately two acres of pasture forming part of my home known as [REDACTED]. The land is not a detached commercial holding; it forms part of the setting, amenity, enjoyment and ordinary use of my home. My objection is focused on the interference with my land and rights, including access during development, the impact of construction and operational works in close proximity to my property, the loss of the countryside setting visible from and enjoyed as part of my home, and potential interference with utilities and internet services on which I rely, including for working from home. I do not consent to the compulsory acquisition, temporary possession, acquisition of rights, creation of new rights, extinguishment, suspension, overriding or interference with any rights affecting my land unless the Applicant can demonstrate that the strict statutory tests are met. Section 122 of the Planning Act 2008 requires the Secretary of State to be satisfied that the land or rights are required for the development, are required to facilitate or are incidental to it, or are replacement land, and that there is a compelling case in the public interest. That is a demanding test. It is not enough for the Applicant to show that interference with my land or rights would be convenient, cheaper, administratively easier, or preferable from the Applicant's point of view. The Applicant must show that the interference is necessary, proportionate and no more than is reasonably required. I object because the Applicant has not demonstrated that interference with my land or rights is "required" within the meaning of section 122. My land is pasture forming part of a residential property and its setting. Any interference with access, services, occupation, quiet enjoyment, existing rights, amenity or use of that land would be a serious private burden. The Applicant must explain precisely what powers are sought over or affecting my land, why those powers are necessary, why less intrusive alternatives are not available, and why the same outcome cannot be achieved by design changes, routing changes, construction controls, protective provisions, voluntary agreement, or other mitigation. The Department for Communities and Local Government guidance, Planning Act 2008: Guidance related to procedures for compulsory acquisition, September 2013, makes clear that compulsory acquisition powers should only be sought where there is a compelling case in the public interest, and that applicants should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. I do not consider that this has been demonstrated in relation to my land. In particular, the Applicant has not shown that the impacts on my access, residential enjoyment, pasture use, services and property setting have been avoided or reduced to the minimum necessary.	See Appendix A: AP 52 - Stephen Paul Goulding
						Access is a particular concern. The [REDACTED] and its associated pasture require safe, practical and reliable access. Any construction traffic, temporary works, road closures, diversions, obstruction, narrowing, mud, noise, vibration, or restricted access could interfere with my ability to use and enjoy my property and land. These are not minor inconveniences. They affect the ordinary occupation of my home, the use and management of the pasture, visitors, deliveries, emergency access, and the general ability to live and work from the property. The Applicant has not provided sufficient certainty that access will be maintained at all times, or that any interference will be avoided, minimised, strictly controlled and enforceable. I also object because of the potential impact on utilities and internet services. I work from home and reliable internet and utility connections are essential to the ordinary use of my property. Any interruption, damage, diversi [COMMENT TRUNCATED AT THIS POINT]	
Stephen Roger Hart	5305	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights	All	Both	As I have attempted to comply with all reasonable requests for access, intrusive and non intrusive surveys and other questions I don't feel there is a need under section 122 to acquire any of the rights over the land. For section 123, I will have a permanent land impairment that will impact my ability to farm, develop or enjoy rightful use and enjoyment of the entire land holding. The holding was purchased in 2019 for £400,000 and considerable input costs have been incurred to bring the holding into productive use. The current stated single payment is derisory in comparison to the productivity and amenity lost.	See Appendix A: AP 53 - Stephen Roger Hart
Heather Jane English	37	Yes	All of the above	A-1/23	Both	A-1/23 NK67663 Following 2 on-site consultations alternative re-routing plans from the west of my front entrance and then to the south along the field boundary west of The Vale up to Church Road were acknowledged. Subsequently no up-dated plans have been received. The original plan still appears to be in place.	See Appendix A: AP 54 - Heather Jane English
Coryn Gladys Hart	15231	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,All of the above,Temporary possession	All	UK Power Networks	For section 123. The land is not strictly required as it is over 1mile away from the proposed works. It is not on any direct or indirect access routes and has had no infrastructure or access requests made upon it.	See Appendix A: AP 55 - Coryn Gladys Hart
Great Cowbridge Grange Farm Ltd	10359	Yes	All of the above	All	Both	Section 122. There is no need to gain additional access to the proposed sites other than via the access road for the Southern Water sewerage treatment works. Section 123. The potential loss to Great Cowbridge Grange Farm Ltd. is of an agreed option with Conrad Energy (Developments) ltd. and respective planning permission to build a solar farm on or adjacent to the land in question The agreement is for a 40 year lease to Conrad Energy of the land unencumbered (As per clause 9 of the option) If the planned works impact or cause the option agreement not to be exercised there will be a loss of 40 years worth of rent and generation income to Great Cowbridge Grange Farm Ltd.	See Appendix A: AP 56 - Great Cowbridge Grange Farm Ltd

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Richard John Allan	6498	Yes	All of the above	All	Both	Objection Summary: Interference with My Land/Rights via Compulsory Acquisition To the Secretary of State for National Infrastructure re: Norwich to Tilbury Project Development Consent Order I, Richard John Allan, owner of [REDACTED], object to the proposed compulsory acquisition of my land / rights over my land / temporary possession of my land EX835923, EX835920 in the draft DCO. Section 122 of the Planning Act 2008 A DCO may include provision authorising compulsory acquisition of land only if the Secretary of State is satisfied that: (a) the land is required for the development (or to facilitate or be incidental to it, or is replacement land); and (b) there is a compelling case in the public interest for the compulsory acquisition. 1. The land is not shown to be required (s.122(2)) The applicant has not demonstrated that my specific land/plots are required, or that the extent of interference (full acquisition / rights / temporary possession) is no more than reasonably necessary. Viable alternatives exist but have not been presented in a fully costed way for fair comparison. The DCLG Guidance (September 2013) states at paragraph 8 that applicants must show all reasonable alternatives to compulsory acquisition (including scheme modifications) have been explored, and that the proposed interference is necessary and proportionate. This test is not met. The interference with my rights is not justified as the minimum required. 2. No compelling case in the public interest (s.122(3)) There is no compelling evidence that the public benefits of acquiring/interfering with my land outweigh the significant private loss I would suffer. The private loss includes permanent loss of farmland my severance of my remaining land; loss of access; disruption to my livelihood/quiet enjoyment; and financial impacts. These effects engage my rights under Article 1 of the First Protocol (peaceful enjoyment of possessions) and, where relevant, Article 8 ECHR. The Guidance (paragraphs 10, 13–16) requires the Secretary of State to balance public benefit against private loss and to be satisfied that the interference is legitimate, necessary, and proportionate. Parliament's view (Guidance para 13) is that land should only be taken compulsorily where there is clear evidence that public benefit outweighs private loss. The applicant has not provided this in relation to my land. The interference fails the test. Section 123 of the Planning Act 2008 A DCO may authorise compulsory acquisition only if one of the conditions in s.123(2)–(4) is met (e.g., the application included a request for CA of the land and proper procedures were followed, or all interested parties consent). I do not consent. I question whether the procedures were adequately followed in respect of my land. The Guidance emphasises seeking acquisition by agreement wherever practicable (paragraphs 21–26 on pre-application consultation and engagement). This has not been achieved. Further relevant Guidance points •Para 8: Failure to explore all reasonable alternatives and lack of proportionality. •Para 9: Inadequate demonstration of a reasonable prospect that funds will be available for the acquisition and related works. The Funding Statement does not sufficiently address my land. •Para 10: The proposal does not adequately justify the interference with my human rights. Conclusion The statutory tests in sections 122 and 123 of the Planning Act 2008 are not satisfied in respect of my land/rights. The Secretary of State should refuse to authorise the compulsory acquisition or other interference with my interests, or modify the DCO to exclude or minimise it. I remain willing to negotiate a voluntary agreement on fair terms but oppose the use of compulsory powers.	See Appendix A: AP 57 - Richard John Allan
Dominic William Petre	1004	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	All	Both	We are trying to engage in the granular planning process and accept that the project need to be done in general so there is no need for compulsory powers	See Appendix A: AP 58 - Dominic William Petre
Lord Petre (W H Norris and Sons)	1406	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights		Both	we are trying to engage with the granular planning process. While there is no objection for the overall need of the project there are many fine details that need agreement but there is no need for compulsory powers	See Appendix A: AP 59 - Lord Petre (W H Norris and Sons)
Lord Petre	1406	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights		Both	We are engaging with the granular planning process. While we accept the overall nature of the project there are many details that still need addressing. However compulsory powers are un needed	See Appendix A: AP 60 - Lord Petre
Peter Albert Kelly	24590	Yes	All of the above	A-7/4 A-7/9 A-7/35	Both	Any land taken from me would have a detrimental affect on the property value and marketability if I wished to move in the future.	See Appendix A: AP 61 - Peter Albert Kelly
Geoffrey Norman William Stevens	2997	Yes	Temporary possession, All of the above	A-6/51	Both	I have completed this form in the way I have as the proposed discussion with National Grid and UK Power Networks has not yet taken place about the works involved and how it affects my property.	See Appendix A: AP 62 - Geoffrey Norman William Stevens
Ann Ruth Stevens	8159	Yes	Temporary possession, All of the above	A-6/51	Both	I have completed this form in the way I have as the proposed discussion with National Grid and UK Power networks has not yet taken place about the works involved and how it affects my property.	See Appendix A: AP 63 - Ann Ruth Stevens
Edward Marriage	2500	Yes	All of the above	All	Both	F-6/62; F-6/63; F-7/10; F-7/13; F7-14; F7-20; F7/22 There are still important points outstanding and the Heads of Terms have not been sufficiently progressed for me to agree with them.	See Appendix A: AP 64 - Edward Marriage

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Andrew Soar	3183	Yes	All of the above	All	Both	Despite numerous meetings with project representatives many of our questions remain to be answered. Our suggestions over pylon positions have also been ignored. Our preference of underground routing appears to be not effectively considered and no project comparisons are available. Vast amounts of land are being taken for the construction and subsequent access easements with very little in the way of compensation particularly with land value effects. Remains of agricultural land adjacent to the project boundary will be uneconomical to operate farm equipment over due to awkward angles and reduced area within fields. Interference from the transmission of electricity is likely to affect phone internet and GPS equipment which is essential in the operation of modern farm equipment. Suggested per pylon rates of compensation do not account for land use during build or over sail compensation. Corner pylons will occupy a much greater area than the mid station pylons. Land that will be used for access but not actually have a pylon upon it will presumably be compensated over and above the pylon construction rate that claims to cover the whole build project. Engagement with land owners agents have been minimal.	See Appendix A: AP 65 - Andrew Soar
Victoria Jordan	2305	No					See Appendix A: AP 66 - Victoria Jordan
Geraldine Alison Millhouse (As deputy of Court of Protection) for John Terence Millhouse	28089 24303 24301	Yes	All of the above	Page 901 - Section H - Sheet 7	Both	Objection raised under advisement of Land Agent (Whirledge and Nott)	See Appendix A: AP 67 - Geraldine Alison Millhouse (As deputy of Court of Protection) for John Terence Millhouse
Robert Pearce	3752	Yes	All of the above	E-3/66, E-4/1, E-4/6, E-4/7, E-4/8, E-4/9, E-4/11, E-4/14, E-4/18	Both	The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	See Appendix A: AP 68 - Robert Pearce
James Robert Pearce	2988	Yes	All of the above	E-3/66, E-4/1, E-4/6, E-4/7, E-4/8, E-4/9, E-4/11, E-4/14, E-4/18	Both	The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	See Appendix A: AP 69 - James Robert Pearce
Heather Ann Pearce	4403	Yes	All of the above	E-3/66, E-4/1, E-4/6, E-4/7, E-4/8, E-4/9, E-4/11, E-4/14, E-4/18	Both	The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	See Appendix A: AP 70 - Heather Ann Pearce
Harry James Pearce	9985	Yes	All of the above	E-3/66, E-4/1, E-4/6, E-4/7, E-4/8, E-4/9, E-4/11, E-4/14, E-4/18	Both	The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	See Appendix A: AP 71 - Harry James Pearce
Lodge Lane Estates Ltd	10205	Yes	All of the above	All	Both	Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, we are not in a position to agree to them.	See Appendix A: AP 72 - Lodge Lane Estates Ltd
Michael Elwyn Hughes	5723	Yes	All of the above	All	Both	I object to the compulsory acquisition of my land and rights. The scheme designed by the Applicant is not appropriate and not within the public interest, when there are reasonable alternatives available. The works will potentially affect development proposals on the land. We are yet to see the proposed heads of terms from UKPN, and until these are in a reasonable format, compulsory powers should not be granted.	See Appendix A: AP 73 - Michael Elwyn Hughes
Peter Blomfield Willows	6506	Yes	All of the above	All	Both	I object to the compulsory acquisition of my land and rights. The scheme designed by the Applicant is not appropriate and not within the public interest, when there are reasonable alternatives available. The works will potentially affect development proposals on the land. We are yet to see the proposed heads of terms from UKPN, and until these are in a reasonable format, compulsory powers should not be granted.	See Appendix A: AP 74 - Peter Blomfield Willows
Verity Louise Collins	7035	Yes	All of the above	All	Both	The works will interfere in the operation of the farming business plus effect the value of the land and any future use of the land, farming or otherwise.	See Appendix A: AP 75 - Verity Louise Collins
Hayden Dixon	3500	Yes	All of the above		Both	I do not want plant machinery passing close to my fence-line, nor workers overlooking my property	See Appendix A: AP 76 - Hayden Dixon
Louise Dixon	9870	Yes	All of the above		Both	I do not want views and beautiful countryside developed. I do not want my sunset views removed and replaced by hideous pylons	See Appendix A: AP 77 - Louise Dixon
Darren Rice	14524	Yes	All of the above,Compulsory Acquisition of land,Compulsory Acquisition of rights,Temporary possession	ALL	Both	Do we live under a dictatorship.?? NO WE DONT.!!! Our family purchased this land generations past to produce food for this country. Not to be ridden roughshod over by an organisation that does care about the Suffolk countryside. OFFSHORE: cheaper, faster, better.	See Appendix A: AP 78 - Darren Rice
Susanna Nunn	28478	Yes	All of the above	All	Both	Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	See Appendix A: AP 79 - Susanna Nunn
Stuart Gooding	28479	Yes	All of the above	All	Both	Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	See Appendix A: AP 80 - Stuart Gooding
Patricia Jane Gooding	1936	Yes	All of the above	All	Both	Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	See Appendix A: AP 81 - Patricia Jane Gooding
Personal representative to the estate of Robin John Lacey Gooding	14961	Yes	All of the above	All	Both	Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, we are not in a position to agree to them.	See Appendix A: AP 82 - Personal representative to the estate of Robin John Lacey Gooding
Richard Percival Marriage	7382	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,Temporary possession,All of the above	ALL	Both	The scope of the compulsory acquisition is beyond that required to facilitate the development.There is no compelling case for the land to be obtained compulsory especially since National grid have made no serios attempts to obtain rights by negotiation and have merely resorted to threats of withdrawal of offers if not completed within a certain time.This is against the guidance where as all efforts should be made to encourage meaningful relationship between all parties.	See Appendix A: AP 83 - Richard Percival Marriage

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Copy Hold Vermögens-Verwaltungsges	4316	Yes	All of the above	ALL	Both	•We do not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. •We do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. •The Applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. •The rights being sought may be wider than necessary for the scheme. •The Heads of Terms are still not in a reasonable or acceptable format. •The current Heads of Terms impose unfair and unreasonable restrictions on landowners. •We do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary, proportionate, or limited to what is reasonably required	See Appendix A: AP 84 - Copy Hold Vermögens-Verwaltungsges
Susan Standen & Kevin Standen	8798 8336	Yes	All of the above	E-581	Both	The proposed haul road close to our property and the proposed traffic lights adjacent to our property will lead to lack of access and obstruction of our drive potentially making it inaccessible for the duration of the project.	See Appendix A: AP 85 - Susan Standen & Kevin Standen
Graham Moore	624 5938 28355	Yes	All of the above	ALL	Both	I am a small farm and it is going to slice through the middle of my business, home and main growing field making it unviable to farm and live.It makes it unable for the local airfields to fly killing local economy and I object on health reasons of the EMF magnetic waves affecting me running my farm safely and me and my families health.	See Appendix A: AP 86 - Graham Moore
Nicola Moore	624 5938 28355	Yes	All of the above	ALL	Both	I object to National grid ploughing straight through the middle of our farm financially ruining us.Straight through our main growing field and our him we will be ruined by the project. I object to the project stopping two local airfields from flying due to safety issues listened to and I object to the EMF waves given off as my family and I do not want to live in a house next to a pylon giving off electric waves that may affect our health and enjoyment of our home and have the danger of my husband safely farming.	See Appendix A: AP 87 - Nicola Moore
Christopher John Thorogood	9128	Yes	All of the above	All	National Grid	Heads of terms are not acceptable	See Appendix A: AP 88 - Christopher John Thorogood
Gillian Mather	8424	Yes	All of the above	All	Both	We are hampered in making any arguments over any application by National Grid to acquire compulsory rights over our land since we don't know what exactly National Grid propose to do or how they propose to overcome any of the physical obstacles which the site presents since they do not engage with us and ignore representations we have made in responses to consultations etc. To be explicit, the site may ultimately require HDDing rather than trenching, but National Grid won't discuss this, although in one of their documents put out several years ago they did propose HDDing under the Blackbrook Stream at Langham and therefore under our land immediately to the south of the Blackbrook. However, they withdrew this plan without explanation or notice. We have attempted to query with National Grid at various stages including at an early stage how they plan to tackle the physical complications of laying cables under the undulating, hilly site including Blackbrook Hill, the Blackbrook Stream, our land and the high-pressure gas main to the south but without response. In view of the above, any attempt to seek compulsory rights would be premature until National Grid have made a final decision how to go about the laying of cables under our land, since it is assumed that rights to trench or alternatively HDD would have to be worded differently. We have already communicated to National Grid that we are willing to enter into a reasonable agreement to grant them necessary and reasonable rights therefore compulsory action should be unnecessary. Our land agents are in the process of attempting to agree Heads of Terms with National Grid though there is no agreement at the moment. Whether National Grid have taken all necessary prescribed steps before making any application(s) to compulsorily acquire rights over our land and considered all other options is a huge technical question given the size of the Norwich to Tilbury project and the amount of paperwork and information so far generated. I can't answer the point.	See Appendix A: AP 89 - Gillian Mather
Stuart Philpot (SJR Farming Ltd)	10273	Yes	All of the above	All	Both	We do not want this on our land, thank you.	See Appendix A: AP 90 - Stuart Philpot (SJR Farming Ltd)
Richard Turner	14378	Yes	Temporary possession	All	Both	Boxted Airfield Museum. The erection of the pylons and the construction works before hand would seriously disrupt our openings in the following ways. The roadways on site date from WW2 and we take visitors on guided walks, these are single carriageway so there would e a risk to the walkers from construction vehicles. This WW2 Airfield site was the base for the Most important American Fighter Aircraft Group serving in Europe. Visitors and relatives of the men who served come to the Museum to get the feel of what their Grandfathers and fathers experienced. 12000 men were stationed here during the course of the second world war. The erection of the pylons would completely spoil the views and destroy the enjoyment for these families. We have then and now pictures on our website and within the Museum and to have those showing pylons I am sure would put visitors off and seriously affect our revenue. The National Lottery recognized this as a Heritage site helping us with financial grants over the years. In the summer months a grass airstrip is established behind the Airfield memorial off Park Lane and is used by a flying club, the pylons would seriously affect this activity. We also have visiting aircraft display on special open days.	See Appendix A: AP 91 - Richard Turner
Tamasyn Holland	28603 20989	Yes	All of the above	ALL	Both	I strongly object to the proposed pylons being located on or affecting my land due to the significant visual, environmental, and property impacts. This proposal would cause unacceptable harm to my property rights, amenity, and the surrounding landscape.	See Appendix A: AP 92 - Tamasyn Holland
Rachel Bryan	28943	Yes	All of the above	All	Both	There are still important points outstanding and the Heads of Terms have not yet been sufficiently progressed	See Appendix A: AP 93 - Rachel Bryan
Andrew David Upson	4711	Yes	All of the above	All	Both		See Appendix A: AP 94 - Andrew David Upson
Janette Upson	7032	Yes	All of the above	All	Both		See Appendix A: AP 95 - Janette Upson
F H Easton Limited	10198	Yes	All of the above	ALL	Both	I am not familiar the various Acts, Sections etc listed above no more than NG are familiar with the growth stages of winter wheat. Without more detail it is difficult to articulate objections precisely on the consequences of what such interference to our land will have. At best compulsory rights will add or bring nothing to the farm and at worst blight and devalue the holding. Those acquiring temporary rights will have little to no interest in the long term effect they may have on the land and it will take a long time, possibly decades to recover from any works. This prediction is based upon more than one poor experience with civil contractors working on our farm.	See Appendix A: AP 96 - F H Easton Limited

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British Pipeline Agency Limited ("BPA") as agents for and on behalf of United Kingdom Oil Pipelines Limited ("UKOP")	21224	Yes	All of the above	All	Both	UKOP is the owner of the 14-inch Thames to Epping high pressure multi fuel pipeline (hereafter called the "Pipeline") and benefits from the associated land rights relating to the Pipeline. BPA is employed as agent by UKOP to operate and maintain the Pipeline and act on its behalf in this DCO process. The below summary is by way of update to the presentations and submissions made on behalf of BPA / UKOP to date including RR-0413, PDA-011, AS-086, REP1-235-238 (inclusive), REP3-121 and the oral submissions made by Fieldfisher on behalf of BPA / UKOP at CAH1. With reference to whether the purposes for which compulsory acquisition powers are sought comply with section 122(2) of the Planning Act 2008 and whether the compelling case in the public interest test under s122(3) of the Planning Act has been met, UKOP's position is as follows: 1.1The private loss which may be suffered by BPA and UKOP (as well as the consequential impacts to persons, the environment, and the key end users operating crucial national infrastructure) are of vital importance as to whether considering whether there is a compelling case for compulsory acquisition. 1.2BPA and UKOP remain of the view that, absent the Order being confirmed with the benefit of the change request as applied for, and further agreements being entered into with the Applicant, the proposed compulsory acquisition in the current form of the dDCO pose an unacceptable risk to the safety of the Pipeline and by extension the environment. 1.3UKOP requires the rights sought in the Change request which has now been accepted into the Examination to enable it to carry out the works proposed under Work [17A]. 1.4Section 127(5) Planning Act 2008 states that in the case of statutory undertakers the SoS should be satisfied that the rights can be purchased without any serious detriment to the carrying on of the undertaking and that any consequential detriment to the carrying on of the undertaking can be made good by the undertaker by the use of other land belonging to or available for acquisition by the undertaker. 1.5UKOP is not a Statutory Undertaker BUT it is the owner of Nationally Significant high pressure fuel infrastructure and as such it and the risks associated with its infrastructure, should be treated equivalently. There is a very real need to ensure robust protections (both practically and in terms of legal rights) to ensure the ongoing use and maintenance of the Pipeline given the reasons of national energy security. In addition to the legal rights sought via the change request UKOP require the Applicant to enter into an asset protection agreement to ensure appropriate protection for the UKOP apparatus. 1.6BPA/UKOP need to ensure that the necessary rights can be guaranteed to be obtained via the Order powers in accordance with the change request to ensure that that: (a)the Order can deliver the necessary powers to cross the Pipeline without serious detriment; or (b)it has or can acquire the necessary land to deliver such mitigation as may be necessary. While BPA / UKOP continue not to have objections to the Project in principle, they do require the Order, as amended by the change request, to be confirmed to ensure that their concerns are fully addressed and suitable protections are secured, preferably by private treaty. BPA / UKOP acknowledge the Applicant's constructive engagement, regular meetings and ongoing efforts to agree contractual protections for the Pipeline, with the aim of reaching a settlement by Deadline 6 so that the objection can be withdrawn. However, until adequate mitigation measures and long-term safeguards are guaranteed and formalised, BPA / UKOP maintain their objection in light of the significant risk of damage to the Pipeline, including accelerated corrosion, which could endanger the public, the environment, and the resilience of nationally significant fuel infrastructure until the Asset Protection Agreement is in place. Those risks and	See Appendix A: AP 97 - British Pipeline Agency Limited ("BPA") as agents for and on behalf of United Kingdom Oil Pipelines Limited ("UKOP")
Mr Toby Reeves	15979	Yes	All of the above	2 moat farm barn ip68je & other properties for whom the development affects in respect of the above	Both	All myself and other parties on the site would like is a transparent view on what the project entails. I had a teams meeting with a chap based in bury st Edmunds named Toby who stated wooden pylons in the field adjacent would be removed and replaced with an underground system but this was some time ago. Has this changed since as the project moves forward at your end? The letters you send us tell us nothing at all in real terms. If we can be confident in your proposal then this moves forward along quite nicely but if you are not clear with us then naturally this will slow things down. Nobody wants this. It actually prevents us and others from listing our properties, should we wish to do so as well as being unsettling as to both current and future values of our homes. Homes we have worked our whole lives for. Please rectify this matter by contacting myself on either [REDACTED]	See Appendix A: AP 98 - Mr Toby Reeves

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Oliver Lukies	10225	Yes	All of the above		Both	We act on behalf of our client Seventyholds Ltd, whose freehold land is impacted by the proposed Norwich to Tilbury scheme. On behalf their behalf, we object to the proposed interference with their land and rights in relation to the Planning Act 2008. Seventyholds Ltd has been promoting, for over 10 years, a comprehensive scheme for the delivery of Southfields Village and Country Park in Thurrock. The current alignment of the proposed overhead line would have a fundamental and unacceptable impact on the deliverability of the scheme. The Southfields proposal comprises a residential-led development of approximately 800 dwellings and a Country Park, including the restoration and long-term public use of an approximately 80-acre former landfill site owned by Thurrock Council. The proposal has been subject to extensive technical work and engagement and represents a deliverable scheme bringing clear housing, environmental and community benefits. The Country Park forms part of an agreed regeneration approach involving Thurrock Council. As currently shown, the proposed 400kV overhead line crosses the southern part of the Southfields site and affects the adjacent landfill regeneration area through the location of new pylons. The effect would be to blight the site to the extent that the residential development would be commercially unviable. The impact is not limited to the land directly occupied, but extends across the wider site through visual intrusion and market perception. In addition, the proposed pylon positions would prejudice the agreed regeneration of the landfill site and restrict the delivery of the Country Park. Taken together, the current alignment would sterilise a well-developed scheme which would otherwise deliver substantial public benefits. A reasonable alternative alignment is available. The line could continue further south along the east side of Buckingham Hill Road, crossing just south of the Holford Road junction. This would remove the blighting effect upon the proposed village site, and the regenerated for recreation purposes Buckingham Hill Road 'Council-owned refuse tip, while occupying land which is presently vacant and unlikely to ever be considered for residential development. There is no evident reason why this alternative would result in any material increase in construction cost or complexity. Again, the current positing of the pylons and overhead lines cannot be regarded as the least harmful option. The proposal falls to be considered under the Planning Act 2008. Section 122 provides that compulsory acquisition may only be authorised where the land is required for the development and there is a compelling case in the public interest. The requirement that land is “required” is a substantive test. Where a reasonable alternative exists which avoids significant harm, it is difficult to conclude that land in this location meets that test. The public interest test requires the benefits of the scheme to be weighed against the harm. Here, that harm includes the loss of a viable housing and regeneration scheme, which weighs heavily against the current alignment. Section 123 further requires that compulsory acquisition is properly justified. Given the availability of a less harmful alternative, the inclusion of the Southfields land within the Order limits cannot be regarded as justified or proportionate. Government guidance reinforces these principles, requiring a clear justification for all land included and a proper balance between public benefit and private loss, taking account of alternatives. The availability of a reasonable alternative alignment significantly weakens any case that the current land take is necessary. The Southfields scheme would deliver substantial housing and environmental benefits. The current alignment would prevent this, whereas the alternative alignment would allow both schemes to proceed. Seventyholds therefore requests that the alignment be amended to follow the alternative route.	See Appendix A: AP 99 - Oliver Lukies
Henrietta Mary Guest	2386	Yes	All of the above	All	Both	The acquisition of rights over our land materially interferes with our ability to farm and the enjoyment that an owner should rightfully have over their land. We believe that as per section 123 subsection 4 we do believe that the prescribed procedure has been followed in relation to the land.	See Appendix A: AP 100 - Henrietta Mary Guest
Rex Webster and G Webster and Son Ltd	5622 7360	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,Temporary possession,All of the above	ALL	Both	I object to the proposed compulsory acquisition of land and rights affecting Flordon Hall and Farm on the basis that the Applicant has failed to demonstrate compliance with the requirements of Sections 122 and 123 of the Planning Act 2008 and the relevant guidance contained in the Department for Communities and Local Government's Planning Act 2008: The proposed acquisition of rights over Flordon Hall, Farm and tenanted properties would permanently interfere with established property rights, agricultural operations, estate management, and future use of the land. Such interference engages fundamental property rights and should not be authorised unless the Applicant demonstrates that the acquisition is necessary and proportionate. ECHR: Under Article 1 of Protocol 1 and Article 8 of the European Convention on Human Rights, the acquisition of rights over private land and the imposition of permanent restrictions must be shown to be necessary and proportionate. The Applicant has not demonstrated that the rights sought over Flordon Hall and Farm have been reduced to the minimum necessary. Nor has it adequately explained why alternative routing, engineering solutions, reduced easement widths, or other less intrusive approaches could not be adopted. Without such evidence, the proposed acquisition cannot be regarded as the minimum interference necessary to deliver the project. Section 123 PA 08 permits the compulsory acquisition of rights rather than land itself but this does not reduce the Applicant's burden of justification. The rights proposed over Flordon Hall and Farm would impose significant and enduring restrictions on ownership and occupation. The Applicant has not provided sufficient evidence that the rights sought have been carefully tailored to what is genuinely required for the project. For the purposes of Sections 122 and 123 of the Planning Act 2008 and the Department for Communities and Local Government Guidance on compulsory acquisition, the Applicant has failed to demonstrate: •that the rights sought over Flordon Hall and Farm are strictly necessary; •that the extent of the proposed acquisition has been minimised; •that the interference with private property rights is proportionate; •that a fair balance has been struck between the public benefits of the project and the substantial prejudice suffered by the landowner. The proposed works would interfere materially with the ownership, occupation, management, enjoyment, and future use of Flordon Hall, Farm and tenanted properties. The proposed route would result in significant adverse impacts on agricultural productivity, farm business operations, landscape character, biodiversity, heritage interests and future development opportunities associated with Flordon Hall and Farm.	See Appendix A: AP 101 - Rex Webster and G Webster and Son Ltd

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Katharine Elizabeth Allan	3432	Yes	All of the above	All	Both	I object to the proposed Compulsory Acquisition (CA), Compulsory Acquisition of rights, and Temporary Possession (TP) of my land and rights for the Norwich to Tilbury project. The Applicant has not demonstrated compliance with the statutory tests in Sections 122 and 123 of the Planning Act 2008, nor with the requirements of the DCLG Guidance (September 2013) on compulsory acquisition. 1. Section 122(2): The land has not been shown to be "required" for the development Section 122(2) requires the Applicant to show that the land is required, necessary to facilitate, or incidental to the development. The DCLG Guidance (paras 11–13) stresses that the land take must be the minimum reasonably necessary and supported by clear evidence. The Applicant has not demonstrated why the full extent of the land and rights sought over my property are required. The scope of the proposed rights is excessive, insufficiently justified, and not supported by plot-specific evidence. No adequate explanation has been provided as to why less intrusive alternatives—such as micro-siting, design adjustments, or alternative access arrangements—cannot be used. Without clear justification, the statutory test of necessity is not met. 2. Section 122(3): No "compelling case in the public interest" Section 122(3) requires the decision-maker to be satisfied that the public benefits clearly outweigh the private loss. The DCLG Guidance (paras 12–13, 17–19) emphasises that compulsory acquisition is a last resort and must be proportionate. The Applicant has not demonstrated that the interference with my land and rights is proportionate. The impacts on the use, enjoyment, and value of my land are significant, yet the Applicant has not provided sufficient detail on the nature, duration, or consequences of the proposed works. Without clear evidence that the public benefits outweigh the harm, the test of proportionality is not satisfied. 3. Section 123: Failure to attempt acquisition by agreement Section 123 requires the Applicant to show that it has made genuine attempts to acquire the land by agreement. The DCLG Guidance (paras 25–28) requires early, meaningful, and ongoing engagement. The Applicant has not engaged constructively with me. Communications have been limited, generic, and lacking in detail. No reasonable offer or explanation of the rights sought has been provided, nor has the Applicant demonstrated that voluntary agreements or reduced -impact alternatives have been explored. The statutory requirement for negotiation has not been met. 4. Lack of clarity and justification for the rights sought The Guidance (paras 13, 20–23) requires clear explanation of why each plot and each right is needed. The Applicant has not provided adequate detail on the extent, purpose, or duration of the rights sought, preventing proper assessment of their necessity or proportionality. 5. Insufficient assessment of alternatives The Applicant has not demonstrated that reasonable alternatives—route adjustments, engineering solutions, reduced land take, or temporary rather than permanent rights—have been properly considered, contrary to the Guidance (paras 13, 18, 21). Conclusion - The Applicant has not shown that the land is required, that the interference is necessary or proportionate, that a compelling case in the public interest exists, or that reasonable efforts have been made to acquire the land by agreement. The statutory tests in Sections 122 and 123 are not met, and I therefore object to the CA, CA of rights, and TP of my land.	See Appendix A: AP 102 - Katharine Elizabeth Allan
John Mather	5872	Yes	All of the above	All	Both	We are hampered in making any arguments over any application by National Grid to acquire compulsory rights over our land since we don't know what exactly National Grid propose to do or how they propose to overcome any of the physical obstacles which the site presents since they do not engage with us and ignore representations we have made in responses to consultations etc. To be explicit, the site may ultimately require HDDing rather than trenching, but National Grid won't discuss this, although in one of their documents put out several years ago they did propose HDDing under the Blackbrook Stream at Langham and therefore under our land immediately to the south of the Blackbrook. However, they withdrew this plan without explanation or notice. We have attempted to query with National Grid at various stages including at an early stage how they plan to tackle the physical complications of laying cables under the undulating, hilly site including Blackbrook Hill, the Blackbrook Stream, our land and the high-pressure gas main to the south but without response. In view of the above, any attempt to seek compulsory rights would be premature until National Grid have made a final decision how to go about the laying of cables under our land, since it is assumed that rights to trench or alternatively HDD would have to be worded differently. We have already communicated to National Grid that we are willing to enter into a reasonable agreement to grant them necessary and reasonable rights therefore compulsory action should be unnecessary. Our land agents are in the process of attempting to agree Heads of Terms with National Grid though there is no agreement at the moment. Whether National Grid have taken all necessary prescribed steps before making any application(s) to compulsorily acquire rights over our land and considered all other options is a huge technical question given the size of the Norwich to Tilbury project and the amount of paperwork and information so far generated. I can't answer the point.	See Appendix A: AP 103 - John Mather
Shelly Eliza Cockrell	3787	Yes	Compulsory Acquisition of land	All	Both	The land in question is woodlands that forms part of our estate that has been in our family for over 60 years. The amount of money that was offered to aquire this land was ridiculously low and we feel that, with the talks about the new estate that will be built on the land behind our property, it should be worth much more. Alternatively, if access to the land is needed to perform maintenance on the oversail, we are happy if the relevant organisation wishes to rent the land.	See Appendix A: AP 104 - Shelly Eliza Cockrell
Colin Henry Smith (A H Smith & Sons)	14506	Yes	All of the above	ALL	Both	High quality producing agricultural land which provides our main income to our farming business and has done for over 100 years.	See Appendix A: AP 105 - Colin Henry Smith (A H Smith & Sons)
Annabel Wood (JA Buntings and Sons)	28603	Yes	All of the above	ALL	Both	I strongly object to the proposed pylons being located on or affecting my land due to the significant visual, environmental, and property impacts. This proposal would cause unacceptable harm to my property rights, amenity, and the surrounding landscape.	See Appendix A: AP 106 - Annabel Wood (JA Buntings and Sons)

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Paul Charles Peter Wenden	2022	Yes	All of the above	All	Both	I see no reason why the project needs to infringe my property as it could be moved eastwards to avoid me completely	See Appendix A: AP 107 - Paul Charles Peter Wenden
Donna Wenden	3080	Yes	All of the above	All	Both	No need to use the land	See Appendix A: AP 108 - Donna Wenden
Christopher Philpot (CJH Holdings Ltd)	10457	Yes	All of the above	11120	National Grid	CJH Farming does not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. Compulsory acquisition is unnecessary. The company has engaged fully with National Grid (NG) and has never had any direct response to any questions raised and therefore can honestly say that we do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. One feels that every meeting I have held with Fisher German has just been a tick box exercise for National Grid so the affected land owner can explain the situation on the ground but then none of this information ACTUALLY gets back to NG and actioned, proof that the applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. CJH Farming is seriously concerned that the rights being sought may be wider than necessary for the scheme - NG want to have Rights over my affected EX number - this EX number for this 'project' covers over 1,000 acres - I can't have NG controlling what happens on the entire holding - that's not fair and needs to be conceded by NG in the draft Heads of Terms. The Heads of Terms are still not in a reasonable or acceptable format. Why can't NG be 'reasonable' rather than being so stubborn and never conceding anything - or agreeing to a practical solution. It's just wasting everyone's time and winding people up unnecessarily. In summary, the current Heads of Terms impose unfair and unreasonable restrictions on landowners. CJH Farming do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary, proportionate, or limited to what is reasonably required. In summary I wish to make it clear that CJH Farming objects to the compulsory acquisition of our land and rights unless and until the Applicant can properly justify the powers sought, reduce the impact on our holding, and agree reasonable terms and protections.	See Appendix A: AP 109 - Christopher Philpot (CJH Holdings Ltd)
CJH Holdings Ltd	10457	Yes	All of the above		Both	CJH Holdings does not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. Compulsory acquisition is unnecessary. The company has engaged fully with National Grid (NG) and has never had any direct response to any questions raised and therefore can honestly say that we do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. One feels that every meeting I have held with Fisher German has just been a tick box exercise for National Grid so the affected land owner can explain the situation on the ground but then none of this information ACTUALLY gets back to NG and actioned, proof that the applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. CJH Holdings is seriously concerned that the rights being sought may be wider than necessary for the scheme - NG want to have Rights over my affected EX number - this EX number for this 'project' covers over 300 acres - I can't have NG controlling what happens on the entire holding - that's not fair and needs to be conceded by NG in the draft Heads of Terms. I am very concerned that NG are wanting access rights through the Essex YFC Show field. This is completely unacceptable and we have tried to tell NG this on a number of occasions. This must not be allowed to happen - there is a perfectly acceptable access directly off the A1060 which was proposed until very recently and I don't understand why the longer route was more recently proposed. We have been assured that this route will not be used or put in the final document - let's see what happens... The Heads of Terms are still not in a reasonable or acceptable format. Why can't NG be 'reasonable' rather than being so stubborn and never conceding anything - or agreeing to a practical solution. It's just wasting everyone's time and winding people up unnecessarily. In summary, the current Heads of Terms impose unfair and unreasonable restrictions on landowners. CJH Holdings do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary, proportionate, or limited to what is reasonably required. In summary I wish to make it clear that CJH Holdings objects to the compulsory acquisition of our land and rights unless and until the Applicant can properly justify the powers sought, reduce the impact on our holding, and agree reasonable terms and protections.	See Appendix A: AP 110 - CJH Holdings Ltd
Abdul Azeem Dhillon	24283	Yes	All of the above	All	Both	This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	See Appendix A: AP 111 - Abdul Azeem Dhillon
Abdul Aleem Dhillon	24284	Yes	All of the above	All	Both	This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	See Appendix A: AP 112 - Abdul Aleem Dhillon

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Abdul Samad Dhillon	24285	Yes	All of the above	All	Both	This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	See Appendix A: AP 113 - Abdul Samad Dhillon
Nasim Akhtar Dhillon	24286	Yes	All of the above	All	Both	This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	See Appendix A: AP 114 - Nasim Akhtar Dhillon
Charles Tritton	4814	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,All of the above,Temporary possession	All	Both		See Appendix A: AP 115 - Charles Tritton
Diana Tritton	6852	Yes	All of the above	All	Both		See Appendix A: AP 116 - Diana Tritton
MRS PRISCILLA VICTORIA LATHAM	8638	Yes	Temporary possession	All	Both	Plots (The land and roads around my house (Manor Farmhouse, Diss Road Tibenham, NR16 1QF) which fronts Diss Road and has Mill Road forming the boundary on the west. I have been unable to access the Book of Reference online to provide the plot numbers.) I object to the access proposals for the construction of the proposed route of the pylons which runs within 300 metres to the east of our land on several grounds: * The roads in front of and to the east of the house are far too narrow to cope with the size of the construction vehicles necessary for such a major development. They will inevitably damage the verges, ditches and hedgerows with potential irreversible damage to our hedgerow trees if they are damaged due to over sized vehicles pushing past them. Or being cut back by contractors to facilitate access without our permission which we are highly unlikely to grant. * Access to our home is will be seriously effected by road closures meaning circuitous routes greatly increasing the mileage incurred during the course of routine daily life. * Our house and garden will effectively on surrounded by construction access routes and the actual line of the pylons - our right of access will be infringed. * The noise and constant activity of heavy construction taking place over a period of months will be detrimental to the natural environment. The wildlife which is abundant here will be adversely effected - reptiles such as Great Crested Newts, Slow Worms and Grass Snakes all of which breed in our garden and the ditches/ponds immediately around us will undoubtedly be impacted by the construction. * In the lead up to construction work, and for its duration any possibility of selling our property with a view to downsizing which is planned in the relatively near future will be impossible without a major reduction in the value.	See Appendix A: AP 117 - MRS PRISCILLA VICTORIA LATHAM
Alan Tritton (Lyons Hall Estate)	8289	Yes	All of the above	All	Both		See Appendix A: AP 118 - Alan Tritton (Lyons Hall Estate)
James Morris	7480	Yes	All of the above,Temporary possession,Compulsory Acquisition of rights,Compulsory Acquisition of land	All	Both		See Appendix A: AP 119 - James Morris
Tritton Farming Partnership LLP	14063	Yes	All of the above,Compulsory Acquisition of land,Compulsory Acquisition of rights,Temporary possession	All	Both		See Appendix A: AP 120 - Tritton Farming Partnership LLP
David Lewis	1997	No					See Appendix A: AP 121 - David Lewis
Stephen Knight, Stanfords LLP	25434	Yes	All of the above	All	Both	I object on behalf of Gent Fairhead & Co Limited, and Blackwater Aggregates to the alignment of the proposed overhead cables and pylons. The Scheme is proposed to pass through Monks Farm, Kelvedon which is subject to the terms of an Option Agreement for mineral extraction in my clients favour. It is National Grids intention to locate pylons TB083 and TB084 in the centre of Monks Farm, which will sterilise significant mineral reserves. Whilst Monks Farm is not yet identified within the Minerals Local Plan, it was submitted to Essex County Council in July 2024 for the purposes of their Mineral Local Plan Review, which is currently under consultation. I have been in discussion with National Grid representatives regarding the route alignment, and we are yet to receive confirmation that the route will re-aligned to the south, closer to the red line application area to help mitigate the sterilisation.	See Appendix A: AP 122 - Stephen Knight, Stanfords LLP
Matthew Bunting	28603 15478	Yes	All of the above	All	Both	Because it would cut our land completely in half and would for ever cause obstruction. Would also create a blot on the landscape of the farm.	See Appendix A: AP 123 - Matthew Bunting

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Derek Boreham	27008	Yes	Compulsory Acquisition of rights,Temporary possession	H-7/20	National Grid	1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my land is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my land. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected landowners. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my land rights is justified or proportionate. 3. Disproportionate Impact on My Agricultural Holding The proposed rights and associated powers would adversely affect the efficient operation of my agricultural holding. Their exercise has the potential to disrupt farming activities, restrict access for agricultural machinery, interfere with field operations and reduce the flexibility with which the land can be managed. As an agricultural business, the cumulative effect of these restrictions extends beyond the area directly affected and has implications for the efficient and economic operation of the holding as a whole. I do not consider that National Grid has adequately demonstrated that these impacts have been minimised or that the least intrusive solution has been adopted. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my land and agricultural operations. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my land. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my agricultural land and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	See Appendix A: AP 124 - Derek Boreham
Mark Easton	10198	Yes	All of the above	ALL	Both	Since the consultation period I believe there has been little or no consideration that given to alternative routes or design changes to lessen the impact to our area. Giving NG a blanket policy to obtain compulsory rights seems completely disproportionate and without regard to what they might actually need. They could put in place compulsory powers for their own convenience or just to keep flexibility to change things sometime in the future without consulting anyone.	See Appendix A: AP 125 - Mark Easton
David and Heather Pearce	7809	Yes	Compulsory Acquisition of rights	F-1/10	National Grid	1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my property. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. The proposals also engage Article 8 rights relating to respect for private and family life and the home. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my property rights and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	See Appendix A: AP 126 - David and Heather Pearce

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Francis Wolton	13769	Yes	Compulsory Acquisition of rights,Temporary possession	G-2/32	National Grid	1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my property. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. The proposals also engage Article 8 rights relating to respect for private and family life and the home. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my property rights and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	See Appendix A: AP 127 - Francis Wolton
Christian Croll and Karl Croll (including representatives to the Estate of Derek Charles Croll)	5249	Yes	Compulsory Acquisition of rights	H-4/84	National Grid	1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my property. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. The proposals also engage Article 8 rights relating to respect for private and family life and the home. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my property rights and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	See Appendix A: AP 128 - Christian Croll and Karl Croll (including representatives to the Estate of Derek Charles Croll)

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Dick Lanham	2823	Yes	All of the above	All plots relating to Sheddings Farm, Church Road, Dunton, Brentwood, CM13 3SS	Both	I object to the proposed interference with my land rights at Sheddings Farm, Church Road, Dunton, Brentwood. The proposed access arrangements would result in a severe and disproportionate interference with my property rights, farming operations, business activities, privacy, security and enjoyment of my home. My objection is not limited to construction access. I object to any proposed access through Sheddings Farm associated with the project, whether temporary, permanent, occasional, maintenance-related or otherwise. Any access through the property interferes with my land rights and has a direct impact on my home, family and farming business. The proposed access route passes immediately adjacent to my family home and would introduce third-party access within close proximity of the dwelling. This creates significant safeguarding, privacy and security concerns. The presence of project personnel, contractors, vehicles or other authorised users accessing the land through this route would fundamentally alter the character and security of our home environment. The land affected forms part of an actively farmed agricultural holding. Any access through the property has the potential to disrupt farming operations, interfere with the use of grazing land and create ongoing biosecurity risks associated with the movement of people, vehicles and equipment through agricultural land. I do not consider that National Grid has demonstrated that the proposed interference with my land rights is necessary or proportionate as required by Sections 122 and 123 of the Planning Act 2008. An alternative access route exists via the public highway and neighbouring land which avoids the significant impacts on my home and farming business. This alternative route has been proposed to National Grid and Fisher German for a considerable period and would substantially reduce the interference with my rights whilst still enabling access to the relevant land. In addition, documents produced by National Grid appear to identify access to the same area of land from the direction of the alternative route, demonstrating that alternative means of access have been considered and are available. In these circumstances, I do not believe that National Grid has demonstrated a compelling case in the public interest for the interference proposed at Sheddings Farm. The availability of a less harmful alternative route means the proposed interference with my land rights is unnecessary and disproportionate. For these reasons, I object to the compulsory acquisition and/or temporary possession of rights affecting Sheddings Farm and request that the Examining Authority gives full consideration to the alternative access arrangements which would significantly reduce the impact on my property, family and business.	See Appendix A: AP 129 - Dick Lanham
Paul Farrelly	1289	Yes	All of the above	All	Both	Serious ingress and egress issues to my property which is fairly isolated and only accessible by vehicle. Any road closure would completely cut off and isolate the property. Noise and light pollution / nuisance by the proposed works. Particularly relevant to myself with a [REDACTED]. Potential vibration structural / foundation damage to my home which is close to the roadside. Dust, dirt and visual blight. Danger posed by large machinery working in such close proximity to property housing family members. Loss of value of my property. Saleability and mortgageability issues.	See Appendix A: AP 130 - Paul Farrelly
Mr Philip Brown & Mrs G Brown	17593	Yes	All of the above	All regarding your map reference N-T_LIQ_18030. OS map reference TM 04 74	Both	We have major concerns regarding the impact heavy machinery would have on the integrity our listed dwelling, which is around 400 years old. We also have concerns about the effect the increased traffic would have on the footfall to our small butchery and farm shop and even more concerns about the noise and vibrations will have on our livestock. The B1113 is already of an insufficient width for the increased amount of heavy modern farm vehicles and lorries which regularly use it, you can already see where the bank at the front of our boundary has been eroded by large vehicles attempting to pass each other on the bend and there is nowhere that roadway widening or passing places could be introduced within the existing public highway.	See Appendix A: AP 131 - Mr Philip Brown & Mrs G Brown

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Christopher Padfield	14511	Yes	Compulsory Acquisition of rights, Temporary possession	G-4/62 G-4/75 G-4/70 G-4/60 G-4/25 G-4/26 G-4/63	Both	1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my land is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my land. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected landowners. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my land rights is justified or proportionate. 3. Disproportionate Impact on My Agricultural Holding The proposed rights and associated powers would adversely affect the efficient operation of my agricultural holding. Their exercise has the potential to disrupt farming activities, restrict access for agricultural machinery, interfere with field operations and reduce the flexibility with which the land can be managed. As an agricultural business, the cumulative effect of these restrictions extends beyond the area directly affected and has implications for the efficient and economic operation of the holding as a whole. I do not consider that National Grid has adequately demonstrated that these impacts have been minimised or that the least intrusive solution has been adopted. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my land and agricultural operations. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my land. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my agricultural land and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	See Appendix A: AP 132 - Christopher Padfield
MARGARET STANCOMBE	24824	Yes	All of the above	ALL	Both	There are still important points outstanding and the Heads of Terms have not yet been sufficiently progressed.	See Appendix A: AP 133 - MARGARET STANCOMBE
Jeremy Robin Sibson-Barnes	1661	Yes	All of the above	All	Both	I believe in the tenants of Common Law that a Freeholder should be the only entity that holds the various rights over their land	See Appendix A: AP 134 - Jeremy Robin Sibson-Barnes
Kay Norman	1755	Yes	All of the above	all	Both	there has been a complete lack of engagement from National Grid and Fisher German with no consideration given to the affect on the life of people this affects	See Appendix A: AP 135 - Kay Norman
Andrew Harry Harbott Stevens	9034	Yes	All of the above	All	Both	The Consultations have been defective - see Legal opinion of Lord Charles Banner QC submitted by Essex Suffolk Norfolk campaign group who found numerous legal deficiencies in National Grid's approach to the consultations arguing it falls well short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination	See Appendix A: AP 136 - Andrew Harry Harbott Stevens
Alcemi Storage Developments 1 Limited	28327	No				We have submitted the requested online form for the interests shown in the Land Rights Tracker, with the Interest in Land (PIL) Reference ID 28327, confirming no objection in relation to these plots. This relates to land held under an Option with R Jackson (East Anglia) Limited dated 28 March 2024. However, Alcemi hold another Option, dated 18 March 2025 with Thornbush Energy Limited. This has been flagged in representations to date as not appearing in the Book of Reference and Alcemi's interest in these plots does not appear to be reflected in the Land Rights Tracker. We therefore cannot deal with these interests via the online form. I attach the previously submitted representations which set out these affected plots (all within Sheet 20). Discussions are continuing with the Promoter to resolve Alcemi's concerns around these plots, but until a suitable Framework Agreement is entered into, Alcemi must continue their objection to the compulsory acquisition of these plots	See Appendix A: AP 137 - Alcemi Storage Developments 1 Limited
ANITA MARGARETA OCTAVIA MOORE	858	Yes	All of the above	ALL	Both	I have lived in Tibenham all my life and my family has farmed the land for generations. This will not only affect family farming land but will also alter the view of Tibenham and the countryside permanently. I believe it is not in the best interests for the countryside in anyway to be disrupted in such a manner.	See Appendix A: AP 138 - ANITA MARGARETA OCTAVIA MOORE
Gavin Peter Moore	624	Yes	All of the above	ALL	Both	My family has farmed this land for generations. This will not only affect my family farming land and business but will also alter the view of the land and the countryside permanently. I believe it is not in the best interests for the countryside in anyway to be disrupted in such a manner.	See Appendix A: AP 139 - Gavin Peter Moore

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Sara Price	2605	Yes	All of the above	ALL	Both	I have tried to engage with this project through my representative but they have had little to no success obtaining answers/solutions and to make real progress, progress is painfully slow, they seem unwilling to fully engage to resolve our issues and concerns. They wish to use my property to access another party's land, I have made recommendations and suggestions which would mean my property would not need to be used, also saving them time and money, this suggestion has been ignored. This is not simply a field issue, my property is a private residents with no connection to the land they wish to use, compulsory acquisition of land or rights or even temporary possession is completely wrong given our attempts to engage with the project and would have a massive negative impact of the use and freedoms with my property. Most concerning is the fact that they wish to use my property for 7-10 years, that is a massive restriction on my home and life considering the pipeline and future equipment is on someone else's land with its own access I feel that the lack of engagement from them is stopping solutions from being found, there are very few land owners involved in the pipe line side of the project and with some simple face to face meetings this could of been resolved weeks ago. I feel that direct individual contact I.E meetings with pipeline affected residents and their representatives could resolve issues and have contracts in place in a matter of weeks.	See Appendix A: AP 140 - Sara Price
Alison Mary Hayward	13768	Yes	Compulsory Acquisition of rights, Temporary possession	All	UK Power Networks	We have been successful in persuading National Grid to relocate one pylon, but only because with the assistance of a NG engineer we were able to demonstrate a benefit to NG of relocating the pylon. We have suggested both in writing and at face to face site meetings re routing a permanent access way to reduce the impact on the farm and to offer NG a more direct shorter route to the relevant pylon. In meeting Fisher German agree with us and say they will take it to NG, but nothing happens. The convoluted route remains the route being persued. We were asked at the initial consultations to put forward proposals to mitigate the loss of 30 acres of grass for 5 years which will severely affect our sheep numbers. We found our neighbouring farm is willing to put 30 acres of arable land into a 5 year ley and let this to us. We have written to Fisher German numerous times asking for accomodation works to achieve this i.e fencing and seeding of grass. Nothing has been heard in response. At our last meeting with FG in May we were told that nothing could be done until the DCO was determined. But to have grass to graze in Spring 2026 we need to be sowing the grass this autumn and that means NG should be negotiating and drafting a Farm Business Tenancy now. It would easy to agree a break clause in the. event of the DCO being refused. It is immensely frustrating to face the threat of serious damage to your farming business and be unable to have a dialogue with NG to address the issues and resolve them. NG doesn't seem to care about what damage it does so long as the line is built on time, it appears blind to everything else.	See Appendix A: AP 141 - Alison Mary Hayward
Jane Sarah Bird	2820	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	All	Both	•There is a lack of necessity to acquire these rights when clearly short term rights would suffice. There are a number of locations where rights are looking to be acquired just for future convenience of the project. This disproportionately prevents efficient and profitable running of the farm in the future. •There has been no consideration of any alternatives to minimize the effect on property rights. No consultation with landowners has been taken seriously and they cannot show where any discussions have been taken into account. •Insufficient negotiations have been made to discuss the Heads of terms, they cannot show where any discussions have been taken into account when drawing up these very generic and wide spread heads of terms.	See Appendix A: AP 142 - Jane Sarah Bird
William Nicholas Bird	2394	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights, All of the above, Temporary possession	All	Both	•There is a lack of necessity to acquire these rights when clearly short term rights would suffice. There are a number of locations where rights are looking to be acquired just for future convenience of the project. This disproportionately prevents efficient and profitable running of the farm in the future. •There has been no consideration of any alternatives to minimize the effect on property rights. No consultation with landowners has been taken seriously and they cannot show where any discussions have been taken into account. •Insufficient negotiations have been made to discuss the Heads of terms, they cannot show where any discussions have been taken into account when drawing up these very generic and wide spread heads of terms.	See Appendix A: AP 143 - William Nicholas Bird
David Michael Stacey	5513	Yes	All of the above	All	Both	The disruption to our daily work activities. We have no rights to object to the actions(it's our land), lack of compensation for any actions.	See Appendix A: AP 144 - David Michael Stacey
Gavin Richard Clark	2309	Yes	All of the above	ALL	Both	despite raising questions and concerns directly in person with National Grid / representatives we are yet to receive answers to eg the working hours of the set down site at Church Lane, Margaretting ie no working/activity outside of Monday to Friday 9am to 5pm. Any potential impact to internet signal from nearby pylons noting we run a business etc	See Appendix A: AP 145 - Gavin Richard Clark
karen elizabeth clark	1890	Yes	All of the above	ALL	Both	despite raising questions and concerns directly in person with National Grid / representatives we are yet to receive answers to eg the working hours of the set down site at Church Lane, Margaretting ie no working/activity outside of Monday to Friday 9am to 5pm. Any potential impact to internet signal from nearby pylons noting we run a business etc	See Appendix A: AP 146 - karen elizabeth clark
Michael John Golding	25624	No					See Appendix A: AP 147 - Michael John Golding

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Benjmain Richard Coode-Adams	1030	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,All of the above,Temporary possession		Both	I notice that the information you are asking for is not freely available nor searchable and you use acronyms with abandon. For this reason your consultation process is flawed and should be restarted with forms people can actually use. I am Ben Coode-Adams, farming partner of G&S Coode-Adams Farm Partnership, operating Feering Bury Farm and Coggeshall Hall Farm in Essex. Three proposed towers — TB077, TB078 and TB079 — fall on farm land. TB080 lies immediately across the road from the boundary and will cause construction-phase disruption to access and operations. This objection is confined to land rights interference under sections 122 and 123 of the Planning Act 2008. No environmental objection is raised. The DCO proposes permanent acquisition of rights, temporary possession and intrusive survey powers at TB077, TB078 and TB079. TB079 is particularly damaging: it falls within fields planted with early blackcurrant varieties entirely dependent on a permanently installed frost-protection and sprinkler irrigation system. Disruption cascades across the whole enterprise. No other part of the farm has frost protection and the early variety cannot be relocated. Yield decline begins before construction, as bushes must be retained beyond their productive lifespan. Total impact spans approximately eight years — the construction period plus a four-year replanting lag. Some 14 hectares will be lost, eliminating a stewardship scheme worth approximately £56,000. Quantified losses include approximately £150,000 per year in lost blackcurrant revenue for up to eight years; approximately £100,000 to relocate and £100,000 to reinstate frost infrastructure; approximately £20,000 per year from farm severance; and approximately £24,000 per year in management costs. Surveys cause further losses through destroyed bushes, compacted headlands and yield suppression. Construction access along Coggeshall Hall drive generates claims for wear, nuisance and safety risk. Ditch disruption may impede run-off to the farm reservoir. TB080 adds construction-phase access disruption. Under section 122 and DCLG Guidance paragraph 8, the applicant must demonstrate that all reasonable alternatives have been explored and that compulsory acquisition is necessary and proportionate. The siting of TB079 within frost-protected fields is not the only workable alignment. A modest repositioning could avoid or substantially reduce cascading enterprise losses. No evidence shows alternatives were assessed and rejected. The cumulative impact of three towers together with TB080's proximity renders the interference disproportionate to any marginal advantage of the chosen alignment. Section 122(3) and DCLG Guidance paragraph 13 require the Secretary of State to be satisfied there is a compelling case in the public interest. Parliament has consistently held that land should be taken compulsorily only where public benefit clearly outweighs private loss. Private loss here is very substantial: destruction of a specialist enterprise dependent on unique fixed infrastructure, financial losses well in excess of £1 million, and permanent imposition of rights over productive freehold land. No assessment weighs these losses against the incremental benefit of the chosen positions. Specific alternatives warranting investigation include repositioning TB079 away from the frost-irrigated fields; repositioning TB077 and TB078 to reduce cumulative impact; provision of replacement frost infrastructure within the consented scheme; engineering measures to protect the ditch and reservoir; and modification of the construction access route. No evidence was provided that any of these was properly examined. The conditions of sections 122 and 123 of the Planning Act 2008 have not been met. I respectfully request that the Secretary of State decline to include compulsory acquisition provisions in the DCO in respect of my land at TB077, TB078 and TB079, or alternatively modify the DCO to exclude or substantially reduce the impact on the frost-protection system and the blackcurrant enterprise at Feering Bury Farm and Coggeshall Hall Farm.	See Appendix A: AP 148 - Benjmain Richard Coode-Adams
Benjamin Richard Coode-Adams	1030	Yes	All of the above	Not known. I've emailed Fisher German but haven't heard back.	Both	I am Ben Coode-Adams, sole owner of [REDACTED]. This is a Grade II listed sixteenth-century timber-framed barn in separate personal ownership from the adjoining G&S Coode-Adams Farm Partnership. No pylon towers are proposed on the barn land itself. This objection is made as the owner of an interest in land whose peaceful enjoyment, heritage significance, amenity and asset value will be materially and permanently interfered with by the authorised works. It is limited solely to interference with my rights and interests in land under the Planning Act 2008 and DCLG Guidance. No environmental objection is advanced. Towers TB075, TB076, TB077, TB078 and TB079 are located on the adjacent farm landholding; TB076 lies immediately across from the barn boundary. All four towers will be visible from the barn, its curtilage and its approach. The barn is a Grade II listed building of sixteenth-century origin whose heritage significance, character and market value are inseparable from the open agricultural landscape in which it has stood for five centuries. The permanent erection of six 50-metre steel lattice pylons in close proximity will irreversibly alter and diminish that setting in a manner which cannot be mitigated and from which the property cannot recover. This constitutes lasting harm to my interest in the property and an irrecoverable diminution in both heritage significance and market value. No compensation framework has adequately addressed this category of loss for a listed building affected by visible infrastructure of this scale. During construction, the near-continuous temporary haul road — typically 8 metres wide with a 21-metre cross-section including topsoil storage and demarcation fencing — will run close to the property. National Grid and contractor vehicles are excluded from existing public roads and directed onto this haul road, carrying heavy construction traffic for the estimated four-year build. A new bridge across the river is to be constructed nearby. The haul road, its plant, heavy vehicles and bridge construction will generate sustained noise, vibration, dust, light pollution and disturbance in close proximity to the barn throughout that entire period. The cumulative impact on amenity, use and letting value is substantial and prolonged. It falls on a property with no towers on its own land and which has made no agreement with the applicant. Under section 122 of the Planning Act 2008 and DCLG Guidance paragraph 8, interference with rights in land must be necessary and proportionate and all reasonable alternatives must have been explored. The applicant has not demonstrated that haul road routing or tower positions were assessed with specific regard to the setting of this listed building. Under DCLG Guidance paragraph 13, compelling evidence must show public benefit outweighs private loss. The permanent and irrecoverable harm to the heritage setting of a Grade II listed sixteenth-century barn, combined with four years of intensive construction disturbance and consequent falls in asset and letting value, constitute a private loss that has not been weighed against the incremental benefit of the chosen alignment. Under DCLG Guidance paragraph 10 and Article 1 of the First Protocol to the ECHR, interference with peaceful enjoyment of property must be lawful, necessary and proportionate. That balance has not been struck. I request that the examining authority require the applicant to assess the impact of the authorised works on Feering Bury Farm Barn as a Grade II listed building and demonstrate that tower positions and haul road routing were properly considered with regard to the heritage and amenity interests in this property. I note you say 1500 words but you actually mean 4000 characters including spaces. This form is appalling for the use of acronyms and jargon and asking for information that is not available.	See Appendix A: AP 149 - Benjamin Richard Coode-Adams

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Mark John Putnam	6008	Yes	All of the above	D-3/26 and all	Both	I object to the proposed acquisition of rights over my land and property and submit that National Grid has failed to satisfy the requirements of Sections 122 and 123 of the Planning Act 2008 and the principles set out in the Department for Communities and Local Government Guidance, "Planning Act 2008: Guidance related to procedures for compulsory acquisition" (September 2013). Section 122 requires that compulsory acquisition powers should only be granted where the land or rights sought are necessary for the development and where there is a compelling case in the public interest. The Guidance further states that applicants must demonstrate that all reasonable alternatives have been considered and that any interference with private property rights must be proportionate, justified and no more than is reasonably required. I do not believe National Grid has demonstrated that the proposed acquisition of rights affecting my property is necessary or proportionate. Nor do I believe that National Grid has established the compelling case in the public interest required to justify the severe impact that this project is having and will continue to have on my family, our home and our property rights. National Grid has not adequately demonstrated why the proposed cables must be routed through or immediately adjacent to my property. Alternative routes, technologies and methods appear to be available. In particular, alternatives involving HVDC technology, offshore routing and subsea options have been dismissed primarily on the basis of cost. However, the assessment of those costs has been undertaken by National Grid itself and I do not believe sufficient evidence has been provided to demonstrate that alternatives have been evaluated in a transparent, objective and balanced manner which properly weighs cost against the substantial impacts imposed on affected landowners. The Government's Guidance states that applicants should demonstrate that all reasonable alternatives have been considered before seeking powers to interfere with private land rights. National Grid has failed to demonstrate that less intrusive alternatives have been fully explored and exhausted before seeking compulsory powers affecting my property. My family home is a small two-bedroom bungalow located immediately adjacent to a narrow strip of land which National Grid refers to as a "pinch point" measuring approximately 120 metres in width. National Grid proposes to use this entire corridor for a haul road and the installation of underground high-voltage electricity cables. The scale, intensity and duration of these activities immediately next to our home will have an exceptional and disproportionate impact on our property rights and our ability to enjoy our home. The proposed works will involve extensive construction activity, heavy machinery, excavation works, vehicle movements and associated disturbance immediately adjacent to our property. We have also been advised that much of the work will take place during night-time periods. The prospect of major construction works occurring directly next to our family home, including at night, raises serious concerns regarding noise, disturbance and loss of sleep. My wife, our [REDACTED] child and I will be subjected to prolonged disruption affecting our daily lives, wellbeing and ability to enjoy the peaceful occupation of our home. The impact of this project extends far beyond temporary inconvenience. The project has already caused severe and demonstrable financial harm to my family through the effective blighting of our property. Following the announcement of the project, we actively attempted to sell our home through multiple estate agents. We initially marketed the property at the values recommended by those agents and subsequently reduced the asking price by more than £120,000 (approximately 33%) in an effort to secure a sale. Despite these substantial reductions, we were unable to find a buyer. Feedback received consistently indicated that prospective purchasers were deterred by the potential presence of the transmission infrastructure and/or the proposed works associated with this project. As a result, our home has become effectively unsaleable except at a very substantial financial loss. We estimate that the loss in value attributable to the project significantly exceeds £120,000. This is not a speculative concern; it is a real and ongoing financial impact that has already materially affected our property rights and financial security. The effect of the scheme has therefore gone significantly beyond ordinary inconvenience. It has effectively removed our freedom to move home and has trapped us in a property which has suffered severe planning blight. The resulting financial uncertainty has caused considerable distress, anxiety and mental health issues for my family. Recognising the serious impact the project was having upon our property, we requested that National Grid purchase our home at its unaffected market value. National Grid refused. As a result, we remain exposed to the continuing effects of blight, uncertainty and loss while being denied any practical means of mitigating the harm caused by the scheme. I am also concerned that National Grid has not provided sufficient clarity regarding precisely what land rights are required, the extent of those rights, the duration of any occupation, the specific activities that may be undertaken on the land, or the long-term restrictions that may apply following construction. This lack of certainty has left my family in a prolonged state of limbo. We are unable to make informed decisions regarding our future, our finances or our property because key information remains uncertain. The continuing uncertainty surrounding the project has imposed a significant emotional and psychological burden on my family. The prolonged inability to move forward with our lives, coupled with the financial losses already suffered and the prospect of years of disruption, has had a serious adverse impact on our mental wellbeing and quality of life. The Guidance accompanying the Planning Act makes clear that there must be a compelling case in the public interest before compulsory acquisition powers can be granted. It also requires a fair balance to be struck between the public benefits of a project and the private losses imposed on those affected. In my case, National Grid seeks powers affecting land immediately adjoining my family home and land within my boundary whilst imposing a level of disruption, uncertainty, financial loss and loss of amenity that is exceptional when compared with the wider public benefit obtained from using this particular corridor. The burden imposed upon my family is disproportionate and National Grid has failed to demonstrate why such a severe interference with our rights is necessary when alternative solutions exist. The Guidance also requires consideration of the rights protected by Article 1 of the First Protocol to the European Convention on Human Rights, namely the peaceful enjoyment of possessions, and Article 8, which protects the right to respect for private and family life and the home. The proposed interference with my property rights is substantial. The project has already caused severe financial harm through property blight, has rendered our home effectively unsaleable, has prevented us from moving home without suffering a major financial loss, and threatens years of disruption immediately adjacent to our property. The interference with our family life will be equally significant due to the anticipated noise, disturbance, loss of amenity, uncertainty and stress associated with the works. The scale and intensity of these works in such close proximity to our home will have a severe impact on our property rights and our ability to enjoy our home. In these circumstances, I do not believe National Grid has demonstrated that the proposed interference with my rights is the minimum necessary to achieve the objectives of the scheme. Nor has it demonstrated that less intrusive alternatives have been properly exhausted. Consequently, I do not believe that the required balance between the public interest and private rights has been achieved. For all of the reasons set out above, I submit that National Grid has failed to satisfy the statutory tests contained within Sections 122 and 123 of the Planning Act 2008. The acquisition of rights affecting my property has not been shown to be necessary, proportionate or justified by a compelling case in the public interest. Accordingly, I object to the proposed interference with my land and property rights and respectfully request that the powers sought over my property be refused.	See Appendix A: AP 150 - Mark John Putnam

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Frederica Susan Chisolm Robins	8681	Yes	All of the above	not known not available	Both	I am Frederica Robins, joint owner of [REDACTED] a Grade II listed sixteenth-century timber-framed barn held in separate personal ownership from the adjoining G&S Coode-Adams Farm Partnership. No pylon towers are proposed on the barn land. This objection is made as joint owner of an interest in land whose peaceful enjoyment, heritage significance, amenity and asset value will be materially and permanently interfered with by the authorised works. It is limited to interference with my rights and interests in land under the Planning Act 2008 and DCLG Guidance. No environmental objection is advanced. Towers TB075, TB076, TB077, TB078 and TB079 are located on or adjacent to the neighbouring farm landholding; TB076 lies immediately across from the barn boundary. All five towers will be directly and permanently visible from the barn, its curtilage and its approach. The barn is a Grade II listed building of sixteenth-century origin whose heritage significance, character and market value are inseparable from the open agricultural landscape in which it has stood for centuries. The permanent erection of five 50-metre steel lattice pylons in close proximity will irreversibly alter and diminish that setting in a manner which cannot be mitigated and from which the property cannot recover. This constitutes lasting harm to my interest in the property and an irrecoverable diminution in both heritage significance and market value. No compensation framework has adequately addressed this category of loss for a listed building so directly affected by infrastructure of this scale. During construction, the near-continuous temporary haul road — typically 8 metres wide with a 21-metre cross-section including topsoil storage and demarcation fencing — will run close to the property and its access. National Grid and contractor vehicles are excluded from existing public roads and directed onto this haul road, carrying heavy construction traffic for the estimated four-year build. A new bridge across the river is to be constructed nearby. The haul road, its plant, heavy vehicles and bridge works will generate sustained noise, vibration, dust, light pollution and disturbance in close proximity to the barn throughout that period. The cumulative impact on amenity, use and letting value is substantial and prolonged. This burden falls on a property that has made no agreement with the applicant and will be continuously affected for the full duration of the works. Under section 122 of the Planning Act 2008 and DCLG Guidance paragraph 8, interference with rights in land must be necessary and proportionate and all reasonable alternatives must have been explored. The applicant has not demonstrated that haul road routing or tower positions were assessed with regard to the setting of this listed building. Under DCLG Guidance paragraph 13, compelling evidence must show public benefit outweighs private loss. The permanent and irrecoverable harm to the heritage setting of a Grade II listed sixteenth-century barn, combined with four years of construction disturbance and consequent falls in asset and letting value, is a private loss not weighed against the incremental benefit of the chosen alignment. Under DCLG Guidance paragraph 10 and Article 1 of the First Protocol to the ECHR, interference with peaceful enjoyment of property must be lawful, necessary and proportionate. That balance has not been struck. I request that the examining authority require the applicant to assess the impact of the authorised works on Feering Bury Farm Barn as a Grade II listed building and demonstrate that tower positions and haul road routing were properly considered with regard to the heritage and amenity interests in this property.	See Appendix A: AP 151 - Frederica Susan Chisolm Robins
Donna Chantry	7604	Yes	All of the above	All	Both	The Norwich to Tilbury project will totally obliterate our countryside, people's homes, affecting wildlife and for no reason there are alternatives like we have already sent over to you. Meetings and webinars were arranged, and those who attended were unanimous in their opposition to the Pylon scheme. Regrettably, our concerns fell on deaf ears. Subsequently, a second consultation emerged, seemingly designed to fulfill checkboxes on National Grid's end, without a genuine consideration of our pleas for offshore or underground alternatives. At a personal level, my family and I are already struggling with the project's impact. The prospect of unsightly pylons marring our countryside and disrupting wildlife habitats deeply troubles us. Should National Grid proceed, the installation of 50-meter-high pylons would undeniably disrupt our local community. Traffic, noise, pollution, and potential health implications all loom large, despite National Grid's assurances of safety. Concerns about cancer risks arising from close proximity to such installations only further our anxieties. As homeowners, we find ourselves in a state of uncertainty. Selling our properties feels unfair to potential buyers, yet the prospect of residing here while awaiting what seems like an inevitable outcome is equally daunting. Recent visits by estate agents have delivered disheartening news — our homes are estimated to depreciate by 30 percent. Having all invested our time, hard efforts, and personal finances into our homes, this revelation is deeply unsettling. Unfortunately, expecting compensation from National Grid for affected properties along this route seems futile. Despite being a privately owned entity, National Grid operates without meaningful government intervention. As a custodian of a grade II listed farm house, i take pride in being a small part of brentwood's rich heritage, However , the impending distruction of the current lanscape fills me will deep sadness and concerns for my homes legacy. [REDACTED] -Please do not let this project go through without looking at the alternatives!.	See Appendix A: AP 152 - Donna Chantry

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Jeremy James Fisher	9639	Yes	All of the above	All	Both	Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1.Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: •There must be a compelling case in the public interest for compulsory acquisition. •The land or rights sought must be necessary for the development. •The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2.Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. For example, the Faulkbourne Estate alone would be affected by 11 new pylons (TB97–TB113) together with significant haul roads and construction activity,in addition to the 6 from the Pelham to Rayleigh line that already cross the Estate under an Easement. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: •Severe disruption to farming operations •Safety risks arising from construction routes •Loss of residential amenity •Interference with existing infrastructure and utilities •Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3.Section 122: Necessity and Scope of Compulsory Acquisition 3.1Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: •National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. •Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, •haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and •the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. The Estate has offered to provide and manage BNG arising from the Scheme through carefully located sites across the Holding, at prevailing BNG Credit values, although equally National Grid could consider the UK BNG Bank. The need to compulsory acquire land for this purpose has not been established. 3.2Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: •Permanent disruption of agricultural land where temporary access could achieve the same objective •Overly wide or intrusive haul roads •Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4.Section 123: Compelling Case in the Public Interest 4.1Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: •The scheme imposes significant and concentrated burdens on specific landowners and communities •These burdens are not adequately mitigated or justified by the chosen route •The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out.	See Appendix A: AP 153 - Jeremy James Fisher

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						Examples include: •A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors •Use of existing redundant pylon routes instead of constructing entirely new infrastructure •Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier consultations (2024–2025), it appears that National Grid has not sufficiently engaged with or incorporated these alternatives. This failure directly undermines the statutory justification for compulsory acquisition. 4.3Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: •Residential impact: properties becoming unlettable due to proximity to haul roads •Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access •Community disruption: interference with footpaths, local routes, and daily activities •Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment •Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For instance, placing a haul road through the centre of a large field would prevent the use of standard 38m machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5.Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: •The consultation process fell short of statutory requirements •There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts •Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: •The Secretary of State cannot be satisfied that all relevant considerations have been taken into account •The statutory tests under sections 122 and 123 cannot properly be met 6.Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: •Negotiations have been ongoing for several years without resolution •Landowners have not been provided with final or clear terms •NG will not engage with landowners suggestions of even minor changes/ameliorations •The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: •Compulsory acquisition powers are being used prematurely •The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7.Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: •Insufficient detail on infrastructure such as bridges across flood-prone areas •Construction proposals that are impractical or unsafe •Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8.Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) •Land and rights are broader than required •Alternatives exist that would reduce land-take •The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) •Impacts on landowners are severe and disproportionate •Consultation and alternatives analysis are inadequate •Negotiation efforts have been insufficient •The balance between public benefit and private harm is not properly justified	

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						9.Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: •The extent of compulsory acquisition is not fully justified •Less intrusive alternatives have not been adequately considered •The impacts on affected landowners and communities are excessive •Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: •Demonstrate genuine optimisation of the route and access arrangements •Provide clear evidence of alternatives being properly assessed •Engage meaningfully with affected parties •Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	
Aura Power Development Ltd	10316	Yes	All of the above	B-1/13, B-1/15, B-1/24, B-1/25, B-1/27, B-1/29, B-1/32, B-1/34, B-1/36, B-1/37, B-1/40, B-1/42, B-1/44	National Grid	Aura Power objects to the inclusion of its land interests and the proposed interference in its land rights within the forthcoming Development Consent Order (DCO) application. National Grid cannot satisfy the strict statutory conditions as set out within Section 122 and 123 of the Planning Act 2008, nor the requirements of the Department for Communities and Local Government Guidance 'Planning Act 2008: Guidance related procedures for compulsory acquisition The Specific objections regarding the differing types of rights to be acquired by National Grid are detailed below: 1.Compulsory Acquisition of Land (Permanent Pylon RG91): Aura Power objects to the compulsory acquisition of land for permanent pylon RG91 under Section 123 of the Planning Act 2008. The Applicant fails to satisfy Section 122(3) of the Act and Paragraph 13 of the Guidance, which dictate that a DCO may only authorise compulsory acquisition if there is a compelling case in the public interest, which outweighs the private loss suffered. Permanent pylon RG91 would cause severe, disproportionate loss by materially disrupting Aura Power's land rights held via an option for lease (via the project SPV Haedus Solar Ltd (company no. 13663837)) and a restriction against title that it holds over the whole of title SK176181. The title is designated for a utility-scale, ground-mounted solar project which already benefits from planning consent (making it committed development) granted by Mid Suffolk District Council on 13 August 2025 (LPA ref. DC/23/05426). The interference in Aura Power's land rights will directly prevent Aura Power from fulfilling its statutory Biodiversity Net Gain (BNG) obligations under its planning consent and its legal obligations relating to provision of skylark plots required under the Section 106 Agreement with Mid Suffolk District Council dated 8 August 2025, and therefore by extension negatively impact overall delivery of the aforementioned consented solar project. By limiting the delivery of a committed, consented renewable energy project, National Grid's proposal creates an irreconcilable conflict between two public interests. Because this DCO application is still in preparation, National Grid has a clear duty under Paragraph 8 of the Guidance to demonstrate that "all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored." National Grid must relocate pylon RG91 to avoid sterilising this committed green energy asset. Failure to modify the scheme means National Grid cannot demonstrate that the land taken is "no more than is reasonably required" under Paragraph 11 of the Guidance, invalidating their case under Section 122(2). 2.Compulsory Acquisition of Rights (Permanent Access to Pylons RG89, RG90 and RG91): Aura Power objects to the compulsory acquisition of permanent rights of access across titles SK176181, SK113952, and SK129903. These access rights permanently conflict with Aura Power's option for lease and cable easement rights for its consented solar development and associated cable route. These permanent rights of access propose to cross Aura Power's consented cable route in at least five locations and will therefore negatively impact Aura Power's land rights to lay a section of underground cable of approx 850 metres that forms part of the essential connection between the solar project and the point of grid connection at Diss BSP, in line with the planning consent granted by South Norfolk District Council on 7 April 2025 (LPA ref. 2023/3574).	See Appendix A: AP 154 - Aura Power Development Ltd

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						Severing or restricting the grid connection infrastructure of an independent renewable energy asset means National Grid cannot justify these rights as "necessary and proportionate" under Paragraph 8 of the Guidance. National Grid has failed to prove that alternative access routes have been fully explored to mitigate this impact, meaning the statutory threshold under Section 122(3) has not been met. 3.Compulsory Acquisition of Rights (Overhead Line Stringing between Pylons RG90, RG91, and RG92): The proposed location for the stringing of the new overhead line between pylons RG90, RG91, and RG92 would introduce unquantified operational risks to Aura Power's committed development. If National Grid requires operational safety buffers underneath the line, it will force an alteration of the aforementioned consented solar project's layout causing a direct loss of solar panels, clean generation output, and revenue for the solar project. Under Paragraph 9 of the Guidance, a DCO applicant must have a "clear idea of how they intend to use the land which it is proposed to acquire." By leaving potential buffer zone restrictions unconfirmed during the pre-application phase, National Grid is seeking disproportionate powers without a legitimate, fully defined purpose. This fails the test of proportionality and necessity set out in Paragraph 8 of the Guidance and Section 122(2) of the Act. 4.Temporary Possession (Haul Road & Construction SuDS for Pylons RG89-RG92): While temporary possession is distinct from permanent acquisition, the draft DCO provision must still satisfy the overarching test of justification, minimisation of impact and proportionality by Paragraph 8 of the Guidance. Temporary possession of land outlined for the Haul Road to reach pylons RG89, RG90, RG91, and RG92 and its associated Construction SuDS would have a material impact on Aura Power's enjoyment of its land rights that exist via an option for lease (via the project SPV Haedus Solar Ltd (company no 13663837)) and restriction against title that it holds over the whole of title SK176181 for the development of a utility scale ground mounted solar project. The interference in Aura Power's land rights will negatively impact its ability to meet its BNG obligations under its planning consent granted by Mid Suffolk District Council on 13 August 2025 (LPA ref. DC/23/05426), negatively impact its legal obligations relating to provision of skylark plots required under the Section 106 Agreement with Mid Suffolk District Council dated 8 August 2025, and negatively impact the visual landscaping that Aura Power hold land rights to implement by virtue of the Haul Road route also crossing through a proposed new hedgerow and new 10m deep treebelt. Therefore the interference in land rights held will impact overall delivery of the aforementioned consented solar project that is already committed development. Forcing temporary possession over this specific alignment creates an immediate compliance breach for an extant planning permission. National Grid has failed to justify why alternative, less damaging haulage routes cannot be utilised, failing the requirements of Paragraph 8 and Section 122(2).	
Claire Monica Oxley Fisher (The Faulkbourne Estate)	6234	Yes	All of the above	All	Both	Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: •There must be a compelling case in the public interest for compulsory acquisition. •The land or rights sought must be necessary for the development. •The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. For example, the Faulkbourne Estate alone would be affected by 11 new pylons (TB97–TB113) together with significant haul roads and construction activity,in addition to the 6 from the Pelham to Rayleigh line that already cross the Estate under an Easement. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: •Severe disruption to farming operations •Safety risks arising from construction routes •Loss of residential amenity •Interference with existing infrastructure and utilities •Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: •National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. •Certain areas appear to be included for flexibility or convenience rather than strict necessity.	See Appendix A: AP 155 - Claire Monica Oxley Fisher (The Faulkbourne Estate)

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						This is especially evident in relation to, •haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and •the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. The Estate has offered to provide and manage BNG arising from the Scheme through carefully located sites across the Holding, at prevailing BNG Credit values, although equally National Grid could consider the UK BNG Bank. The need to compulsory acquire land for this purpose has not been established. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: •Permanent disruption of agricultural land where temporary access could achieve the same objective •Overly wide or intrusive haul roads •Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: •The scheme imposes significant and concentrated burdens on specific landowners and communities •These burdens are not adequately mitigated or justified by the chosen route •The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: •A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors •Use of existing redundant pylon routes instead of constructing entirely new infrastructure •Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier consultations (2024–2025), it appears that National Grid has not sufficiently engaged with or incorporated these alternatives. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: •Residential impact: properties becoming unlettable due to proximity to haul roads •Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access •Community disruption: interference with footpaths, local routes, and daily activities •Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment •Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For instance, placing a haul road through the centre of a large field would prevent the use of standard 38m machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: •The consultation process fell short of statutory requirements •There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts •Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: •The Secretary of State cannot be satisfied that all relevant considerations have been taken into account •The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: •Negotiations have been ongoing for several years without resolution •Landowners have not been provided with final or clear terms •NG will not engage with landowners suggestions of even minor changes/ameliorations •The promoter continues to revise fundamental aspects such as the basis of compensation claims	

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						This raises concerns that: •Compulsory acquisition powers are being used prematurely •The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: •Insufficient detail on infrastructure such as bridges across flood-prone areas •Construction proposals that are impractical or unsafe •Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) •Land and rights are broader than required •Alternatives exist that would reduce land-take •The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) •Impacts on landowners are severe and disproportionate •Consultation and alternatives analysis are inadequate •Negotiation efforts have been insufficient •The balance between public benefit and private harm is not properly justified 9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: •The extent of compulsory acquisition is not fully justified •Less intrusive alternatives have not been adequately considered •The impacts on affected landowners and communities are excessive •Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: •Demonstrate genuine optimisation of the route and access arrangements •Provide clear evidence of alternatives being properly assessed •Engage meaningfully with affected parties •Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	
Stacey Farms Ltd	10402	Yes	All of the above	ALL	Both	Lack of financial compensation	See Appendix A: AP 156 - Stacey Farms Ltd
Carol Gosling	4794	Yes	All of the above	All	National Grid	I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights therefore goes further than is reasonably required. National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination. The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	See Appendix A: AP 157 - Carol Gosling

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Dennis Gosling	7327	Yes	All of the above	All	National Grid	I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights therefore goes further than is reasonably required. National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination. The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	See Appendix A: AP 158 - Dennis Gosling
Alexander David Robert Micklem	6898	Yes	All of the above	All	Both	I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights therefore goes further than is reasonably required. National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination. The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	See Appendix A: AP 159 - Alexander David Robert Micklem
Charles Nicholas Micklem	14503 (spreadsheet not been updated since Charles Micklem inherited the land, so does not have own PIL reference)	Yes	All of the above	All	Both	I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights therefore goes further than is reasonably required. National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination. The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	See Appendix A: AP 160 - Charles Nicholas Micklem

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Personal Representative to the Estate of Frederick Hamilton	25512	Yes	All of the above	ALL	Both	Current, slightly ambiguously worded, announcements suggest the the project may CA land for use after the construction of the pylon route is completed. While we appreciate that easement access for maintenance to the pylons is required, acquisition of land will severely impact the usefulness of the surrounding fields. Furthermore, it is unclear why such acquisition is justifiable unless the National Grid etc. are planning on farming ?	See Appendix A: AP 161 - Personal Representative to the Estate of Frederick Hamilton
Martyn Mills	17600	Yes	All of the above	B-2/23	Both	Conformation required that the rights do not extend beyond the highway into my title.	See Appendix A: AP 162 - Martyn Mills
Hugh Hamilton	15833	Yes	All of the above	ALL	Both	It is unclear why the N-T operator will, upon completion of the project, have need to compulsorily acquire portions of land in order to provide maintenance and upkeep of the line instead of the usual permissive easements which are typically used. Loss of agricultural land will impact the ongoing access, usage & profitability of the surrounding land.	See Appendix A: AP 163 - Hugh Hamilton
Paul Edmund Baker	3085 14920 5262	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights	All plots within our interest multiple especially 9/53 9/56 9/102 9/99	Both	Insufficient consultation. Land originally not impacted then route change (Suffolk 3 Change) occurred with no further consultation in regards to new land impacts created by change. The Rights to be acquired re 9/53 9/56 9/102 9/99 are way beyond what could be achieved with alternatives that we have been unable to discuss that would have lower cost and impact for all parties	See Appendix A: AP 164 - Paul Edmund Baker
Radnoel Ltd	17432	Yes	All of the above	All	Both	how's this? Objection to Compulsory Acquisition / Interference with Land Rights (EN020027) I object to the proposed compulsory acquisition of my freehold land in connection with EN020027, as a Category 1 and/or Category 2 Affected Person under section 57 of the Planning Act 2008. Compelling case not established (Section 122(3)) The Applicant has failed to demonstrate a compelling case in the public interest as required by Section 122(3). There is no adequate justification that my specific land is essential to the scheme, nor that the public benefits clearly outweigh the private harm caused to me as a freehold owner. Lack of necessity and unjustified routing (Section 122(2)) Section 122(2) requires that land is no more than reasonably necessary to deliver the development. The routing appears to have been selected in a way that directly affects my freehold despite the apparent availability of viable alternative alignments that would avoid my land entirely. My land does not represent the most logical or least intrusive option. The Applicant has not demonstrated that alternatives have been properly assessed or that the extent of land take represents the minimum required. Failure to engage and negotiate (DCLG Guidance, paras 8–10, 25–27) The DCLG Guidance requires meaningful efforts to acquire land by agreement and to engage directly with affected persons. To date, engagement has been limited to generic communications, with no meaningful one-to-one negotiation, no attempt to agree terms, and no exploration of how impacts on my land might be avoided or reduced. This falls short of the Guidance requirements. Disproportionate interference (Guidance and human rights principles) The proposed acquisition represents a disproportionate interference with my property rights. Given that alternative routes appear available, the decision to acquire my freehold is not justified. The Applicant has not demonstrated that a less intrusive solution would be incapable of delivering the scheme. Overbreadth of land take (Section 123) The extent of land sought from my freehold is excessive and not clearly limited to what is strictly necessary. No adequate explanation has been provided as to why a reduced land take, or an alternative alignment avoiding my land, would be insufficient. Uncertainty as to deliverability (Section 122(2)(b); Guidance paras 13–17) There is insufficient certainty that the scheme, insofar as it affects my land, is fully funded and deliverable. This further undermines the justification for granting compulsory acquisition powers. Conclusion The proposed acquisition does not satisfy the statutory tests in Sections 122 and 123 of the Planning Act 2008 or the requirements of the DCLG Guidance (September 2013). The Applicant has failed to demonstrate necessity, proportionality, proper engagement, or a compelling public interest case in respect of my land. The routing unjustifiably targets my freehold where alternatives appear to exist. Accordingly, compulsory acquisition powers should not be authorised in respect of my interest.	See Appendix A: AP 165 - Radnoel Ltd
Stephen Baker, for H&O Godbold Partnership, and Thornbush Energy Ltd	28420, 28421, 9646,	Yes	All of the above	All	Both	We DO recognise the need for this major upgrade in energy infrastructure, but we have found it necessary to formally object due to the manner in which National Grid have pursued the implementation of the DCO project on our farm. a) The process for gaining CPA/TP does not withstand scrutiny, and is flawed (see our formal objection for legal detail). In particular consultation has been lacking, and - until recently - engagement very poor. b) As yet UKPN have not agreed the land they will finally need access to, and their consultation process has started very late - too late - for CPA/TP to be effective. c) Areas of land initially included by NGET for compulsory purchase (e.g. soil bund, and extension to sub station site) have already been revised following negotiation, which begs the question, where else is no longer necessary to be compulsorily acquired? d) Access requirements/arrangements to allow the farm to continue to function as a business have still not been finalised. e) There is confusion between this and the other DCO (Bramford to Twinstead), with both projects claiming the need to access the same land on our farm. Although work continues on Heads of Terms, and agreeing how the DCO can proceed effectively on Thornbush Farm, the fundamental points made in our objection about process and engagement remain entirely valid, and the lack of progress obliges us to conclude that we cannot withdraw our objection at this time.	See Appendix A: AP 166 - Stephen Baker, for H&O Godbold Partnership, and Thornbush Energy Ltd

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Stephanie Jane Bickford	7371	Yes	Temporary possession, Compulsory Acquisition of rights	G-4/53	Both	I object to the proposed interference with my land rights through the acquisition of a temporary access easement over plot G-4/53, at 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG, registered title number EX681970. Under Sections 122 and 123 of the Planning Act 2008, the compulsory acquisition of rights should only be authorised where the applicant can demonstrate that the rights sought are necessary, proportionate and supported by a compelling case in the public interest. The Department for Communities and Local Government Guidance further requires a clear justification for the extent of any rights sought and that interference with private rights is no greater than is reasonably necessary. I do not consider that National Grid has adequately demonstrated that these requirements have been met. The rights sought in the application are broad and potentially permit a wide range of activities. However, during discussions, National Grid representatives have indicated that the intended use may be more limited than the powers sought. Despite this, the application documents have not been amended, and there remains uncertainty as to the actual extent of rights required and how they would be exercised. In addition, key information necessary to assess the proportionality of the interference remains outstanding. This includes details of the construction programme, duration and sequencing of works, working hours, traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures. National Grid has also indicated that potential mitigation for impacts on my household, including measures to reduce noise at source, is being considered. National Grid has been made aware that members of my household have protected characteristics which require particular consideration when assessing the impacts of the proposed rights; however, no final assessment, mitigation strategy, implementation plan or supporting documentation has been provided. In the absence of this information, it is not possible to understand how these matters have been taken into account or how they inform the assessment of proportionality. Whilst engagement has taken place, responses have largely been generic and have not provided sufficient property-specific information. Following recent discussions, no written confirmation of proposals, assessments, or mitigation measures has been received, and there remains a lack of clarity between the application documents and information discussed in meetings. There is also no information or documentation provided to demonstrate that alternative approaches, access arrangements, or less intrusive means of delivering the stated objective have been considered in relation to my property. In the absence of such evidence, it is not possible to assess whether the rights sought represent the minimum necessary interference with private property rights. National Grid is seeking broad, flexible rights over my property, but without sufficient property-specific justification or settled parameters it cannot be demonstrated that those rights represent the minimum necessary interference with my land. The information currently available does not enable an assessment of the nature, duration and extent of the interference that may result from the exercise of the rights sought, nor whether the statutory tests in Sections 122 and 123 of the Planning Act 2008 are met. For these reasons, I continue to object to the proposed acquisition of rights over my property on the basis that necessity and proportionality have not been demonstrated.	See Appendix A: AP 167 - Stephanie Jane Bickford
Daniel James Bickford	5663	Yes	Compulsory Acquisition of rights, Temporary possession	G-4/53	Both	I object to the proposed interference with my land rights through the acquisition of a temporary access easement over plot G-4/53, at 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG, registered title number EX681970. Under Sections 122 and 123 of the Planning Act 2008, the compulsory acquisition of rights should only be authorised where the applicant can demonstrate that the rights sought are necessary, proportionate and supported by a compelling case in the public interest. The Department for Communities and Local Government Guidance further requires a clear justification for the extent of any rights sought and that interference with private rights is no greater than is reasonably necessary. I do not consider that National Grid has adequately demonstrated that these requirements have been met. The rights sought in the application are broad and potentially permit a wide range of activities. However, during discussions, National Grid representatives have indicated that the intended use may be more limited than the powers sought. Despite this, the application documents have not been amended, and there remains uncertainty as to the actual extent of rights required and how they would be exercised. In addition, key information necessary to assess the proportionality of the interference remains outstanding. This includes details of the construction programme, duration and sequencing of works, working hours, traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures. National Grid has also indicated that potential mitigation for impacts on my household, including measures to reduce noise at source, is being considered. National Grid has been made aware that members of my household have protected characteristics which require particular consideration when assessing the impacts of the proposed rights; however, no final assessment, mitigation strategy, implementation plan or supporting documentation has been provided. In the absence of this information, it is not possible to understand how these matters have been taken into account or how they inform the assessment of proportionality. Whilst engagement has taken place, responses have largely been generic and have not provided sufficient property-specific information. Following recent discussions, no written confirmation of proposals, assessments, or mitigation measures has been received, and there remains a lack of clarity between the application documents and information discussed in meetings. There is also no information or documentation provided to demonstrate that alternative approaches, access arrangements, or less intrusive means of delivering the stated objective have been considered in relation to my property. In the absence of such evidence, it is not possible to assess whether the rights sought represent the minimum necessary interference with private property rights. National Grid is seeking broad, flexible rights over my property, but without sufficient property-specific justification or settled parameters it cannot be demonstrated that those rights represent the minimum necessary interference with my land. The information currently available does not enable an assessment of the nature, duration and extent of the interference that may result from the exercise of the rights sought, nor whether the statutory tests in Sections 122 and 123 of the Planning Act 2008 are met. For these reasons, I continue to object to the proposed acquisition of rights over my property on the basis that necessity and proportionality have not been demonstrated.	See Appendix A: AP 168 - Daniel James Bickford
Jane Elizabeth Smith	15224	Yes	All of the above	All	Both	We do not want this	See Appendix A: AP 169 - Jane Elizabeth Smith

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
ScottishPower Renewables UK Limited	10227	Yes	All of the above	B-20/174, B-20/179, B-20/181, B-20/182, B-20/183, B-20/185, B-20/191, B-20/195, B-20/197, B-20/199, B-20/202, B-20/204, B-20/205, B-20/180	National Grid	ScottishPower Renewables UK Limited (“SPRUKL”) is the landowner of a consented Nationally Significant Infrastructure Project comprising offshore wind generation and associated onshore transmission infrastructure and is therefore directly affected by the Proposed Development. While it does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests. In particular, SPRUKL submits that the Applicant has failed to comply with the requirements of Sections 122 and 123 of the Planning Act 2008 and the Department for Communities and Local Government Guidance (September 2013) on compulsory acquisition. Section 122(2) requires that land or rights may only be acquired where they are necessary for the development or to facilitate it, and Section 122(3) requires a compelling case in the public interest. SPRUKL’s position is that the Applicant has not demonstrated that interference with SPRUKL’s land or rights is necessary, as the Proposed Development appears to conflict with existing and consented SPRUKL infrastructure corridors in a manner that could reasonably be avoided through protective provisions or voluntary agreements. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified restrictions on the tenants of SPRUKL’s ability to access, operate and maintain its infrastructure. The statutory test requires that land be needed rather than merely desirable or convenient, and SPRUKL considers that this threshold has not been met. Furthermore, although SPRUKL recognises the general public benefits associated with the Proposed Development as transmission infrastructure, the Applicant has not demonstrated a compelling case in the public interest in respect of the specific interference with SPRUKL’s interests, as required by Section 122(3). The assessment of public interest must consider the balance between the benefits of the scheme and the harm caused, and in this case there has been insufficient consideration of the cumulative interaction between two nationally significant infrastructure projects. SPRUKL’s, EA1L’s & EA3’s infrastructure contributes to national renewable energy generation and decarbonisation objectives, and any restriction on its operation, maintenance or future development has the potential to undermine those objectives. In addition, the Applicant has not satisfied the requirements of the DCLG Guidance, which makes clear that compulsory acquisition should only be used where there is a compelling justification, that reasonable alternatives have been properly considered and that the extent of acquisition is proportionate. The Guidance requires that applicants minimise interference and use compulsory powers only as a last resort following reasonable negotiation. In this case, SPRUKL considers that the rights sought are disproportionate, that insufficient steps have been taken to minimise the extent of interference and that meaningful agreement has not yet been achieved. The proposals risk imposing safeguarding constraints and operational limitations. The principles underlying Section 123 of the Planning Act 2008 are also engaged, given the nature of SPRUKL’s infrastructure as nationally important energy infrastructure. Those principles require that land should not be acquired where this would cause serious detriment to the carrying on of the undertaking. SPRUKL is concerned that the Proposed Development may result in such detriment by restricting access for maintenance and emergency works, increasing safety risks and imposing operational inefficiencies. Finally, SPRUKL considers that there has been insufficient engagement and negotiation in accordance with the DCLG Guidance, which requires applicants to seek agreement wherever possible and to use compulsory acquisition only as a measure of last resort. While discussions have taken place, they have not resulted [COMMENT TRUNCATED AT THIS POINT]	See Appendix A: AP 170 - ScottishPower Renewables UK Limited
Annabel Gardiner (Lord Rayleigh's Farm Ltd)	1275	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	All	National Grid	REP1-247 and REP3-124 Purpose of Representation – from a tenants and landowners perspective The purpose of this representation is to ensure the scheme is designed and implemented in a manner sympathetic to existing land uses, particularly the Estate’s ongoing commercial farming and shooting operations. We also highlight concerns with the engagement process and the potential environmental and operational impacts of the proposals. Key Concerns Environmental Impacts - We are particularly concerned about the effect on local listed buildings and their settings. The mitigation measures proposed to date appear insufficient to fully address potential harm. 1.Compulsory Acquisition of Land - The extent of compulsory acquisition proposed is considered unnecessary and will have a significant adverse impact on the Estate’s commercial shoot operations. 2.Design Issues - There is no clear justification provided for the decision not to use underground cabling, which could reduce surface impacts. Additionally, safety concerns arise regarding machinery working near overhead cables. 3.Construction Impacts - The construction phase is expected to have a massive impact on the small rural roads around Fairstead, causing disruption, safety issues, and inconvenience to local residents and businesses. 4.Stakeholder Engagement - Engagement to date has been very poor. Notifications have been late, information insufficient or inaccurate, and responses to submitted concerns have not been forthcoming. This has caused unnecessary stress and uncertainty. 5.Soil and Drainage - We are concerned about the long-term impacts on soil quality and drainage, particularly in haul road areas. There is insufficient detail about how soil compaction and drainage disruption will be mitigated or remediated. Engagement The Estate, together with its agent, has engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect mapping, as well as an additional submission on 26th February 2026. To date, we have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution, hampering meaningful review and causing significant time and stress. The late notification of additional land required for an attenuation pond is a further example of inadequate consultation. Impact on the Estate	See Appendix A: AP 171 - Annabel Gardiner (Lord Rayleigh's Farm Ltd)

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						Farming Operations - The proposals will cause significant disruption during construction, with potential long-term impacts on farming productivity, including risks of soil compaction and reduced yields. 1.Soil and Drainage - Existing drainage systems must be maintained intact, as per drainage plans provided by the Estate. We seek assurance that land disturbed will be fully restored. 2.Cable Depth - We request a minimum soil cover of 1.2 metres above cables to protect agricultural machinery and land use. 3.Construction Management - Managing the farm during construction will require significant additional time and resources for access coordination, supervision, and ongoing operational adjustments. Compulsory Acquisition and Heads of Terms We are not yet in a position to negotiate Heads of Terms, pending further instruction from our agent. It is critical that the extent of land acquisition is fully justified and minimised. A properly designed scheme is essential to reduce impacts on the Estate. Environmental and Landscape Considerations The development will result in disruption to landscape character and farming practices. This representation aims to ensure impacts are minimised and appropriately mitigated. Pylon Locations - TB116 should be repositioned as far east as possible toward the hedged boundary to reduce farming impacts. - TB117 should be at least 40 metres from the southern field boundary to allow machinery access. Permanent Access Routes (Plan 1275) We request permanent access routes follow existing field boundaries rather than cross through fields. Biodiversity Net Gain (BNG) Woodland identified for BNG within Plan 1275 must be removed from Order Limits, as it is not available for sale and is integral to the Estate's commercial shooting operations. Solar DCO Interaction The land is subject to an approved DCO for Longfield Solar Farm, with existing third-party rights. Early coordination between National Grid, the Solar Farm, and the Estate is essential to minimise conflict. Shooting and Farming Operations Two key shooting drives will be affected, potentially making the shoot unviable during construction. We request National Grid works with the Estate to avoid shooting seasons and minimise farming disruption. Failure to do so may lead to financial losses and compensation claims. Final Note The cumulative burden of the process so far — including poor engagement and unaddressed consultation points — has caused considerable stress and operational challenges. We request that these concerns be fully taken into account in the examination.	
Lucy Alexandra Nutting	7972	Yes	All of the above	ALL	Both	1) the consultations have been defective 2) there are fundamental errors in National Grid's DCO application, 3) I do not consider the compulsory acquisition of my land and rights to be in the public interest, particularly where reasonable alternatives are available, as proposed previously. 4) I do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on my holding. 5) The Applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. 6) The rights being sought may be wider than necessary for the scheme. 7) The Heads of Terms are still not in a reasonable or acceptable format. 8) The current Heads of Terms impose unfair and unreasonable restrictions on landowners. I do not consider that the Applicant has demonstrated that the interference with my land and rights is necessary, proportionate, or limited to what is reasonably required.	See Appendix A: AP 172 - Lucy Alexandra Nutting
Nigel Edwin Markham	101	Yes	All of the above	All	Both	One of the NtoT pylons is planned to be situated at the corner of our field. There are normal pylons and a gas main crossing the same corner, but despite numerous requests, no one has been able to clarify for us how/where the normal pylons and the gas main will be relocated and the implications to us. We haven't been told the implications to us of the NtoT pylons either outwith it being on our land. We need a realistic image of what the NtoT pylons are anticipated to look like so that the impact to our land can be fully assessed, for example loss of potential development value. Also we have no information on what compensation we would be offered if any of our land was to be put under CA or TP. We need all this information to be able to consider the impact of the NtoT plans. Lastly with modern engineering capabilities, we find it hard to believe that these cables can't be put underground as they have been elsewhere where it has been deemed to be more important to do so.	See Appendix A: AP 173 - Nigel Edwin Markham
Elizabeth Anne Sprunt	6786	Yes	All of the above	All	Both	One of the NtoT pylons is planned to be situated at the corner of our field. There are normal pylons and a gas main crossing the same corner, but despite numerous requests, no one has been able to clarify for us how/where the normal pylons and the gas main will be relocated and the implications to us. We haven't been told the implications to us of the NtoT pylons either outwith it being on our land. We need a realistic image of what the NtoT pylons are anticipated to look like so that the impact to our land can be fully assessed, for example loss of potential development value. Also we have no information on what compensation we would be offered if any of our land was to be put under CA or TP. We need all this information to be able to consider the impact of the NtoT plans. Lastly with modern engineering capabilities, we find it hard to believe that these cables can't be put underground as they have been elsewhere where it has been deemed to be more important to do so.	See Appendix A: AP 174 - Elizabeth Anne Sprunt
Silke Pinson-Roxburgh	17619	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	All	National Grid	It will impepde on my rights to my own property	See Appendix A: AP 175 - Silke Pinson-Roxburgh
Colin Pinson-Roxburgh	17618	Yes	All of the above	All	Both	because of the disruption it will cause	See Appendix A: AP 176 - Colin Pinson-Roxburgh

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Paul Lanham	539	Yes	All of the above	All land interests at Dukes Farm, [REDACTED] affected by the proposed acquisition of land, acquisition of rights and/or temporary possession.	Both	I object to the proposed interference with my land rights at Dukes Farm, [REDACTED]. The proposed acquisition of rights and/or temporary possession would result in a substantial and disproportionate interference with the operation of my farm business and my use and enjoyment of the land. Dukes Farm is a long-established working agricultural holding. The land affected forms an integral part of the farming operation and supports livestock grazing, a commercial turkey enterprise, agricultural activities and associated business interests. The proposed rights would interfere with the day-to-day management of the farm, impact grazing land, disrupt farming operations and create significant biosecurity concerns associated with third-party access, vehicles and equipment entering the holding. The turkey enterprise operates under strict biosecurity requirements. Any increase in third-party access across the farm presents a significant risk to those operations and to the continued viability of that part of the business. Biosecurity is a critical consideration for livestock enterprises and the proposed rights would introduce ongoing uncertainty and risk. In addition, the proposals would affect areas associated with the fishing lake and surrounding land which form an important part of the wider farm business. Any access associated with the project, whether temporary, permanent, occasional, maintenance-related or otherwise, represents an interference with my land rights and with the normal operation of the farm. The issue is not simply the frequency of access but the imposition of rights over private agricultural land where less harmful alternatives are available. I do not consider that National Grid has demonstrated that the interference with my land rights is necessary or proportionate as required by Sections 122 and 123 of the Planning Act 2008. Alternative access arrangements have been identified and raised during the examination process which would significantly reduce the impact on Dukes Farm and the wider farming business. In these circumstances, I do not believe that a compelling case in the public interest has been demonstrated for the extent of the interference proposed at Dukes Farm. For these reasons, I object to the compulsory acquisition and/or temporary possession of rights affecting Dukes Farm and request that the Examining Authority gives full consideration to the alternative access arrangements and the significant impact that the proposed interference would have on my property, farming business and livelihood.	See Appendix A: AP 177 - Paul Lanham
Ben Knighton	3677	Yes	All of the above	All	National Grid	1.An extension for drainage from contaminated digging of the trench and laying of cables direct to the brook on our land (which runs to the River Stour) 2.Interruption of land drains, probably irredeemable, leading to loss of fertility and value of cultivable land 3.Raising of clay and stones close to the topsoil, later subsidence of soil over the trench, and soil compaction, leading to loss of fertility and value of cultivable land 4.50m pylons and the cables to the west and east will still daunt the plot 200m from where I was born 5.Permanent structures, above-ground apparatus, tracks, and easements on the plot, which will interfere with agricultural operations	See Appendix A: AP 178 - Ben Knighton
Stephen Mugliston	2253	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights	All	Both	The applicant has failed to explain why the land rights are required for the development or even provide details of what land rights are required. Because of this lack of detail, the applicant has failed to demonstrate that there are no alternatives and has made no genuine attempt to negotiate. During a meeting with the applicant's agent, Fisher German, stated that they could not provide any details about the reason for the proposed acquisition, nor could they explain why the applicant needed to acquire any rights over the land. They also stated that "It was unlikely that National Grid would need to compulsory purchase but retained it as a possibility as details of the rights that need to be acquired were not available....." This despite a compulsory acquisition notification being issued. For something described on the "Compulsory land acquisition schedule" as "house and premises," National Grid should have provided more information. The applicant claims a meeting took place to "review discuss and negotiate detailed clauses within Heads of Terms issue v1," but in the absence of adequate information provided by National Grid, no meaningful negotiations took place. The statutory notices do not correlate with the entries in the Land Rights Tracker documentation. There are "land rights" listed on "AENC-TQST-LAN-REP-0002 Detailed Land and Rights Negotiations Tracker - Category 1 & 2 interests", that do not appear in the statutory notifications. The email "correspondence" that National Grid claims took place, consists of a variety of statutory notices and notifications and does not constitute a genuine attempt to negotiate. In summary, the applicant's actions to date consist of a deluge of notices and notifications which provide no specific information about the acquisition of rights. Their agent cannot even advise the nature of the rights that National Grid want to acquire. Their approach appears to be a rushed attempt to complete procedural steps without providing detailed, specific information about how the landowner will be affected. As a result, National Grid have been unable to enter into meaningful negotiations and are unable to establish that the proposed acquisition is necessary and proportionate. Other evidence supplied to the Planning Inspectorate has clearly demonstrated that the public benefits for the scheme have been overstated and therefore National Grid cannot effectively assess that the public benefit outweighs the harm to the affected party's property nor are they able to fully explore alternative arrangements that do not involve the compulsory acquisition of rights over the affected land.	See Appendix A: AP 179 - Stephen Mugliston

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
June Elizabeth Mugliston	225324	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	All	Both	The applicant has failed to explain why the land rights are required for the development or even provide details of what land rights are required. Because of this lack of detail, the applicant has failed to demonstrate that there are no alternatives and has made no genuine attempt to negotiate. During a meeting with the applicant's agent, Fisher German, stated that they could not provide any details about the reason for the proposed acquisition, nor could they explain why the applicant needed to acquire any rights over the land. They also stated that "It was unlikely that National Grid would need to compulsory purchase but retained it as a possibility as details of the rights that need to be acquired were not available....." This despite a compulsory acquisition notification being issued. For something described on the "Compulsory land acquisition schedule" as "house and premises," National Grid should have provided more information. The applicant claims a meeting took place to "review discuss and negotiate detailed clauses within Heads of Terms issue v1," but in the absence of adequate information provided by National Grid, no meaningful negotiations took place. The statutory notices do not correlate with the entries in the Land Rights Tracker documentation. There are "land rights" listed on "AENC-TQST-LAN-REP-0002 Detailed Land and Rights Negotiations Tracker - Category 1 & 2 interests", that do not appear in the statutory notifications. The email "correspondence" that National Grid claims took place, consists of a variety of statutory notices and notifications and does not constitute a genuine attempt to negotiate. In summary, the applicant's actions to date consist of a deluge of notices and notifications which provide no specific information about the acquisition of rights. Their agent cannot even advise the nature of the rights that National Grid want to acquire. Their approach appears to be a rushed attempt to complete procedural steps without providing detailed, specific information about how the landowner will be affected. As a result, National Grid have been unable to enter into meaningful negotiations and are unable to establish that the proposed acquisition is necessary and proportionate. Other evidence supplied to the Planning Inspectorate has clearly demonstrated that the public benefits for the scheme have been overstated and therefore National Grid cannot effectively assess that the public benefit outweighs the harm to the affected party's property nor are they able to fully explore alternative arrangements that do not involve the compulsory acquisition of rights over the affected land.	See Appendix A: AP 180 - June Elizabeth Mugliston
The Honourable John Frederick Strutt	9897	Yes	All of the above	All	Both	REP3-158 and REP1-393 Purpose of Representation The purpose of this representation is to ensure the scheme is designed and implemented in a manner sympathetic to existing land uses, particularly the Estate's ongoing commercial farming and shooting operations. I also highlight concerns with the engagement process, environmental and heritage impacts, and the potential operational impacts of the proposals. Consultation and Engagement The Estate, together with its agent, has engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect mapping, as well as an additional submission on 26th February 2026. To date, we have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution, hampering meaningful review and causing significant time and stress. Key Concerns and Harm Caused by the Project Heritage - Significant visual impact on the Parish Church of St Mary the Virgin at Fairstead and Beauchamps House. To avoid detracton from the rural setting, we request the lines be buried. Environment, Habitat, and Species - The project passes near Galley Cable Wood and Troys Spring, which are important wildlife sites. Ground-nesting birds and other species will be affected. Landscape - The project will compound landscape impacts caused by existing 400kV lines. The alignment should, where possible, follow the route of existing lines to minimise new impacts. Proximity to Business - Agricultural workability of fields will be significantly reduced. Sporting rights (shooting operations) will also be severely affected. Breaches of Holford Rules - We have concerns regarding design and routing in relation to Holford Rules, particularly regarding landscape sensitivity. Access Roads - Proposed access roads will have a severe impact on agricultural output and soil compaction. Connection Method - The connection should be either under the sea or underground to minimise surface impacts. Impact on Farming and Shooting Operations The Estate operates a commercial shoot, with two principal drives likely to be affected, potentially making them unviable. National Grid should coordinate with the Estate to avoid shooting seasons during construction and minimise impacts on farming operations. Failure to do so will likely result in financial losses and potential compensation claims.	See Appendix A: AP 181 - The Honourable John Frederick Strutt

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						Solar DCO Interaction The land is subject to an approved DCO for Longfield Solar Farm. There are existing third-party rights. Early engagement between National Grid, Longfield Solar Farm, and the Estate is critical to minimise development conflicts. Access Routes Plan 5111-1: Permanent access should follow the existing track along the field edge, not cut into the field. Plan 5111-2: Permanent access should follow the existing track along the field edge, not cut into the field. Environmental and Landscape Considerations The development will result in landscape, environmental, and heritage impacts. This representation aims to ensure impacts are minimised and appropriately mitigated. Final Note The cumulative burden of the consultation process, poor engagement, and the proposed impacts on the Estate's operations and environment is substantial. We request that these concerns be fully taken into account during the examination.	
Alan Bruce Marshall	3513	Yes	All of the above	All	Both	My wife and I have been custodians and farmers of this land for over 45 years. Our land is all grade 1 BMV and should be kept as that. Defra say there is only 3% of this quality in the country. We feel that the nations food security should be taken more into account. The planning act (2008) clearly states that the land requirement must prove there is no alternative especially where grade 1 land is involved. We have seen no proof and have been asking since the first consultation. We have turned down offers from a quarry company as we overly 12m of sand and ballast including silica sand.We have turned down an application for building. This is how strongly we feel! We have looked after it, to the best of our ability, without any doubt for the future and being able to pass it on to our children. They are now of the age they should be discussing their views for the future of our farm but this has now been put on hold for probably 5+years during the proposed construction and we don't know what devastation we will be left with afterwards! We are a small farm of 78 acres of which the proposed project is claiming 64 acres leaving us one 11acre field that we are going to struggle to get a contractor interested in servicing. Our fields are edged by ancient hedgerows which provide us our land security. These will apparently be devastated by the proposed project which will also affect the vast amount of wildlife, that we have encouraged, that rely on such hedges. The rights being sought are far wider than necessary for the scheme and the applicant seems to have ignored any constructive feedback from ourselves and other landowners. The applicant has not demonstrated to us that they have considered any alternatives schemes. The applicant is asking for us to sign Heads of Terms that are unfair and contain unreasonable restrictions. The cash incentives look like a bribe to get us to sign but then find we are no longer able to comment on the scheme!	See Appendix A: AP 182 - Alan Bruce Marshall
EDF Energy Renewables Ltd	15477	Yes	All of the above	A-1/42, A-1/43, A-1/44, A-1/45, A-1/46, A-3/9, A-3/14, A-3/15, A-4/7, B-4/85, B-5/29, B-5/33, B-5/38, B-5/39, B-5/40, B-5/41, B-5/42, B-5/43, B-5/44, B-5/45, B-5/50, B-5/52, B-5/53, B-5/55, B-5/56, B-5/57, B-5/58, B-5/60, B-5/62, B-5/72, B-5/82, B-5/90, B-5/92, B-5/93, B-5/96, B-5/97, B-5/99, B-5/102, B-5/103, B-5/104, B-5/105, B-5/106, B-5/110, B-5/112, B-5/113, B-6/1, B-6/4, B-6/5, B-6/6, B-6/8, B-6/11, B-6/15, B-20/107, B-20/108, B-20/109, B-20/113, B-20/114, B-20/118, B-20/121, B-20/125, B-20/133, B-20/135, B-20/136, B-20/137, B-20/138, B-20/142, B-20/143, B-20/145, B-20/147, B-20/148, B-20/149, B-20/150, B-20/151, B-20/152, B-20/153, B-20/154, B-20/155, B-20/156, B-20/157, B-20/158, B-20/159, B-20/160, B-20/161, B-20/162, B-20/163, B-20/164, B-20/165, B-20/166, B-20/167, B-20/168, B-20/169, B-20/170, B-20/171, B-20/172, B-20/173, B-20/174, B-20/175, B-20/176, B-20/177, B-20/178, B-20/179, B-20/180, B-20/181, B-20/182, B-20/183, 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B-20/984, B-20/985, B-20/986, B-20/987, B-20/988, B-20/989, B-20/990, B-20/991, B-20/992, B-20/993, B-20/994, B-20/995, B-20/996, B-20/997, B-20/998, B-20/999, B-20/1000	Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on EDF Energy Renewable's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on EDF Energy Renewable's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	See Appendix A: AP 183 - EDF Energy Renewables Ltd	

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Pivoted Power LLP	20342	Yes	All of the above	A-1/2, A-1/7, A-1/53, B-20/188, B-20/189, B-20/190, B-20/194, B-20/196, B-20/198, B-20/200, B-20/203, B-20/208, B-20/213, B-20/221, B-20/229, B-20/230, B-20/232, B-20/233, B-20/234, B-20/237, B-20/239, B-20/242, B-20/243, B-20/244, B-20/246, B-20/247, B-20/249, B-20/253, B-20/257, B-20/258, B-20/259, B-20/260	Both	Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on Pivoted Power LLP's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Pivoted Power LLP's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	See Appendix A: AP 184 - Pivoted Power LLP
Ashgreen Energyfarm Limited	15917	Yes	All of the above	A-1/2, A-1/7, A-1/53, A-1/56, A-1/57, A-2/12, A-2/14, A-2/21, A-2/31, A-2/45, A-2/46	Both	Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on Ashgreen Energyfarm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Ashgreen Energyfarm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	See Appendix A: AP 185 - Ashgreen Energyfarm Limited
W Bradshaw & Son C/o David William Bradshaw	7196	Yes	All of the above	All	Both	The Consultations have been defective - see Legal Opinion of Lord Charles Banner QC submitted by Essex Suffolk Norfolk campaign group who found numerous legal deficiencies in National Grid's approach to the consultations arguing it falls well short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination.	See Appendix A: AP 186 - W Bradshaw & Son C/o David William Bradshaw

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Longfield Solar Energy Farm Limited	25194	Yes	Compulsory Acquisition of rights,Temporary possession	E-6/31, E-6/32, E-6/38, E-6/39, E-6/40, E-6/42, E-6/43, E-8/1, E-8/2, E-8/3	Both	Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on Longfield Solar Energy Farm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Longfield Solar Energy Farm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	See Appendix A: AP 187 - Longfield Solar Energy Farm Limited
DamsonGreen Energyfarm Limited	29271	Yes	Compulsory Acquisition of land, Temporary possession	B-20/176, B-20/186, B-20/187, B-20/192, B-20/193	National Grid	Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on DamsonGreen Energyfarm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on DamsonGreen Energyfarm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	See Appendix A: AP 188 - DamsonGreen Energyfarm Limited

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Mrs Jayne Bridget Marshall	5883	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights, All of the above, Temporary possession	ALL	Both	Our family run farm has provided us with a steady income, security and a much loved home in a rural environment that we have managed and cared for with dedication for +40 years. Our home is our safe place and where we work, rest and enjoy time with family and friends. The thought of losing this is upsetting and a constant worry, to say the least! It belongs to us! Our plans for our children to take over the farm in future years will offer no incentive for them to do so if pylons, overhead high voltage cables and underground HVAC cabling are to blight our land and take over the area as they currently know it. All our land is of finest quality Grade 1 BMV soil (approximately only 3% nationwide), which enables high volumes of good quality staple diet crops (eg wheat, barley, potatoes, sugarbeet) to be grown on it. Maintaining sustainable returns for us, whilst contributing also to our country's all important food chain (National Food Security) is of massive importance to us. During the proposed construction period, our 45 year old bramley apple orchard would be affected by dust, resulting in smaller fruit size, surface contamination and a crop not fit for sale. Our land structure will never recover! We are totally opposed to the use of any soil stabilization materials, as has been suggested! Our property will be open and vulnerable to trespassing and fly tipping if our ancient hedgerows are ripped out (some with tree preservation orders in place). These provide much natural security. Insurance premiums are likely to increase (extra cost to us) if security is compromised. National grid's (NG) proposals to upgrade its grid system (Norwich to Tilbury) now threaten everything we, as a family have worked hard for, and just the thought of what's planned is indescribably sickening! The proposals contradict the Planning Act of 2008 (section 122) and where it states that applicants (in this case, National Grid) must demonstrate that they have explored all other alternatives to ensure compulsory acquisition is a last resort and kept to the absolute minimum. To date, National Grid has failed to provide us with any alternative options, failed to answer questions and many of its representatives are often arrogant and dismissive. National Grid's consultations have been defective throughout, there are fundamental errors in the DCO and as an example, we are still waiting for results from all survey works carried out on our land thus far, despite having asked on numerous occasions. Where are these results? Most of our land will be ruined beyond repair (3 pylons and 200 meter swathes for HVAC underground cabling) if this project is granted planning consent. One remaining field (so we thought) of 11 acres will be difficult to manage efficiently and cost effectively. We have, in the last few days, been informed by our land agent that Fisher German (on behalf of NG) now want to survey this field also, which is outside of the order limit. Why is it that NG seems to be doing just as it pleases? I question why changes to an already submitted DCO application should be permitted, as has been the case on numerous occasions? It's undemocratic, unfair and unacceptable! Our entire land/property will be devalued! Relocation is not an option! You cannot move a farm and we also have another business on site. Compulsory acquisition is not in the interest of the public when alternative methods of upgrading the system haven't been considered. We have, in the past, rejected offers from housing developers to purchase some of our land. We know we have at least 12 meters of sand and ballast beneath our fine topsoil, yet we've declined the opportunity to excavate; for the simple reason that Farmland is For Food! We will still be expected to pay our annual land drainage charge to the Environment Agency, as will most of the affected landowners. This hasn't been mentioned! The Heads of Terms are unreasonable and should be considered bribery! A case of 'signing prior to a DCO being consented and receive an early-signing incentive payment' (up to 20% land fights value), or forfeit this by refusing. By signing, we will be unable to make further comments about the proposal (in other words.....Sign up and shut up). These are bully-boy tactics! The applicant (NG) hasn't demonstrated that interference is necessary, proportionate or limited to what is reasonably required. We feel we can't plan for the future, invest in solar panels for a new barn we built, erect new fencing, plant a foraging woodland (as we had hoped to do) or invest in new equipment. In conclusion: Our farm is our life! We ALL need food, and in order to provide it, we must protect the land upon which it grows!	See Appendix A: AP 189 - Mrs Jayne Bridget Marshall
Cullum Agric Ltd	5577	Yes	Compulsory Acquisition of rights,Temporary possession	ALL	Both	This submission is made on behalf of T A Cullum and is based upon the detailed written representations submitted at Deadline 4 for CAH2. This Landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required or feasible, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and may outweigh any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas, and are supported by incomplete and fragmented information. The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated. By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms. To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.	See Appendix A: AP 190 - Cullum Agric Ltd

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
T A Cullum Contracting Ltd	24776	Yes	Temporary possession, Compulsory Acquisition of rights	All	National Grid	The landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweighs any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas, and are supported by incomplete and fragmented information. The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated. By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms. To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.	See Appendix A: AP 191 - T A Cullum Contracting Ltd
Norwich Diocesan Board of Finance Limited	10177	Yes	Compulsory Acquisition of rights, Temporary possession	ALL	National Grid	This submission is made on behalf of the Norwich Diocesan Board of Finance Limited and is based upon the detailed Written Representation submitted at Deadline 4 for CAH2. Our client objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweigh any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas, and are supported by incomplete and fragmented information. The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. The Applicant has further failed to properly address occupier interests, where land is subject to agricultural tenancies. It is inappropriate to expect the landowner to negotiate on the Applicant's behalf, and this omission creates additional uncertainty, contrary to the Guidance requirement to identify and address all land interests. Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated. By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms. To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.	See Appendix A: AP 192 - Norwich Diocesan Board of Finance Limited
D N Grady & Sons Ltd	10516	Yes	Compulsory Acquisition of rights, Temporary possession	ALL	Both	This submission is made on behalf of D N Grady Ltd and is based upon the detailed written representations submitted at Deadline 4 for CAH2. The landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweighs any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas, and are supported by incomplete and fragmented information. The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. The Applicant has further failed to properly address the occupier interests, where the land is subject to agricultural tenancy. It is inappropriate to expect the landowner to negotiate on the Applicant's behalf, and this omission creates additional uncertainty, contrary to the Guidance requirement to identify and address all land interests Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated. By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms. To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.	See Appendix A: AP 193 - D N Grady & Sons Ltd

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Katherine S Lee	254689410	Yes	Compulsory Acquisition of rights, Temporary possession	ALL	UK Power Networks	This submission is made on behalf of Katherine Lee and in her role as Personal Representative to the Estate of Michael Lee and is based upon the detailed Written Representation submitted at Deadline 4 for CAH2. The landowner is affected only by third-party utility works and objects to the interference with the land and rights on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013). Under Section 122, there is no compelling case, with insufficient clarity on third-party utility works, limited engagement, and failure to properly consider a less impactful alternative route. The land and rights sought have not been shown to be necessary or proportionate, and impacts on farming operations have not been minimised. Under Section 123, the proposals lack clarity and completeness, with uncertainty over land take, temporary possession, construction activities, and reinstatement. Supporting information is fragmented and high-level, preventing proper assessment. The Applicant has also not complied with Guidance, having failed to treat compulsory acquisition as a last resort, properly consider alternatives, provide a robust evidence base, or minimise impacts. The scheme would cause temporary land loss, disruption to farming, and long-term business impacts, which have not been adequately mitigated and are therefore disproportionate. By way of an update UKPN's agents have now offered a meeting to discuss outstanding matters, however, issues relating to coordination, routeing, and impacts remain unresolved, and this does not overcome the fundamental deficiencies identified above. Overall, compulsory acquisition is premature and unjustified, as the scheme is not sufficiently defined, impacts remain unclear, and meaningful engagement has not taken place.	See Appendix A: AP 194 - Katherine S Lee
2 Agriculture Growing Limited	15476	Yes	Compulsory Acquisition of rights, Temporary possession	ALL	Both	This objection is submitted on behalf of 2 Agriculture Growing Ltd and is based on the detailed written representations provided at Deadline 4 for CAH2, which set out the landowner's concerns in full. Our client is affected by third-party utility works and objects on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013). Under Section 122, there is no compelling case, with insufficient clarity on third-party utility works, limited engagement, and failure to properly consider a less impactful alternative route. The land and rights sought have not been shown to be necessary or proportionate, and impacts on farming operations have not been minimised. There has been a failure to engage with the occupier's interests, as a tenant operating a poultry unit. The Applicant has not shown that the land and rights sought are necessary or proportionate, nor that reasonable steps have been taken to acquire them by agreement. The absence of engagement and clarity around occupier rights undermines the case that compulsory acquisition is justified. The proposals lack clarity and completeness, particularly in relation to the rights sought and how occupiers' legal interests will be secured. There is no clear framework setting out how engagement will take place or what is expected of affected parties, leaving the tenant in a position of uncertainty and preventing meaningful negotiation. The Applicant has also failed to comply with the 2013 Guidance, including not demonstrating compulsory acquisition as a last resort, by failing to engage meaningfully with our client. The scheme presents a risk of significant disruption to an operational poultry business, with potential impacts not yet properly understood or addressed due to lack of engagement and clarity. By way of an update UKPN's agents have now offered a meeting to discuss outstanding matters, however, issues relating to coordination, routeing, and impacts remain unresolved, and this does not overcome the fundamental deficiencies identified above. Overall, compulsory acquisition is premature and unjustified, as the Applicant has not properly engaged with our client, has failed to demonstrate that all reasonable steps have been taken to secure agreement, and has not provided sufficient clarity on the rights sought or impacts of the scheme.	See Appendix A: AP 195 - 2 Agriculture Growing Limited

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
East Anglia Three Limited	20335	Yes	All of the above	B-20/174, B-20/179, B-20/181, B-20/182, B-20/183, B-20/185, B-20/191, B-20/195, B-20/197, B-20/199, B-20/202, B-20/204, B-20/205.	National Grid	Note plot B-20/180 appears to be marked for compulsory acquisition on EN020027-002892-2.2 Land Plans – Section B, Revision C however is not marked for compulsory acquisition under the Book of Reference, this is to be clarified. In any event, it is marked in the Book of Reference for temporary possession, to which we object. East Anglia Three Limited (“EA3L”) is the developer of a consented Nationally Significant Infrastructure Project comprising offshore wind generation and associated onshore transmission infrastructure, and is directly affected by the Proposed Development. NGET seek CA and TP powers over land owned by ScottishPower Renewables (UK) Limited (“SPRUKL”), EA3L’s direct owner, in which EA3L has various rights. The compulsory acquisition and temporary possession of land owned by SPRUKL, in combination with powers sought under Articles 14 and 16 of the draft DCO to temporarily close Bullen Lane, would put EA3, a critical national infrastructure project, at risk. Bullen Lane is the only access road leading to the EA3 substation, and then to the access track used to access the SuDs pond for the EA3 substation. It is therefore vital that 24/7 uninterrupted access to the EA3 substation via Bullen Lane is maintained for fire and safety reasons, as well as to ensure the continued maintenance of the EA3 substation and SuDs pond, which are vital parts of the overall EA3 windfarm operation. While EA3L does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests. In particular, EA3L submits that the Applicant has failed to comply with the requirements of Section 122 of the Planning Act 2008 and the Department for Communities and Local Government Guidance (September 2013) on compulsory acquisition. Section 122(2) requires that land or rights may only be acquired where they are necessary for the development or to facilitate it, and Section 122(3) requires a compelling case in the public interest. EA3L’s position is that the Applicant has not demonstrated that the extent of CA and TP powers being sought, which would allow the Applicant to exclude EA3L from using Bullen Lane, the access road to the EA3 substation, and the access track to the SuDs pond, rights is necessary. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified restrictions on EA3L’s ability to access, operate and maintain its infrastructure. Furthermore, although EA3L recognises the general public benefits associated with the Proposed Development as transmission infrastructure, the Applicant has not demonstrated a compelling case in the public interest in respect of the specific interference with EA3L’s interests, as required by Section 122(3). The assessment of public interest must consider the balance between the benefits of the scheme and the harm caused, and in this case there has been insufficient consideration of the cumulative interaction between two nationally significant infrastructure projects. EA3’s infrastructure contributes to national renewable energy generation and decarbonisation objectives, and any restriction on its operation, maintenance or future development has the potential to undermine those objectives. In addition, the Applicant has not satisfied the requirements of the DCLG Guidance (paragraphs 8-10), which makes clear that compulsory acquisition should only be used where there is a compelling justification, that reasonable alternatives have been properly considered and that the extent of acquisition is proportionate. The Guidance requires that applicants minimise interference and use compulsory powers only as a last resort following reasonable negotiation. In this case, EA3L considers that the rights sought are disproportionate, that insufficient steps have been taken to minimise the extent of interference and that meaningful agreement has not yet been achieved. The proposals risk imposing safeguarding constraints and operational limitations.	See Appendix A: AP 196 - East Anglia Three Limited
						The principles underlying Section 127 of the Planning Act 2008 are also engaged, given the nature of EA3L’s infrastructure as nationally important critical energy infrastructure. Those principles require that the Secretary of State cannot authorise the compulsory acquisition of statutory undertakers’ land where this would cause serious detriment to the carrying on of the undertaking. EA3 holds an interest in the listed plots for the purposes of carrying on the construction and operation of the EA3 offshore windfarm. EA3 is significantly concerned that the Proposed Development will result in serious detriment to the carrying on of the construction and operation of the EA3 offshore windfarm by restricting access to the EA3 substation and its SuDs pond for maintenance and emergency works, increasing safety risks and imposing operational inefficiencies. The EA3 substation is a vital part of the overall windfarm operation, which is wholly dependent on the operation and function of the EA3 substation. Finally, EA3L considers that there has been insufficient engagement and negotiation in accordance with the DCLG Guidance (paragraph 25), which requires applicants to seek agreement wherever possible and to use compulsory acquisition only as a measure of last resort. While discussions have taken place, they have not resulted in agreed protective provisions or coexistence arrangements sufficient to safeguard EA3L’s interests, and the Applicant’s reliance on compulsory powers is therefore premature. Accordingly, EA3L objects to the compulsory acquisition powers sought over its rights.	
Hugh French / Guy French / Rockbroon Ltd / James French / E French & Sons	14142	Yes	All of the above	All.	Both	We object to land or any being compulsorily acquired. National Grid should engage in meaningful negotiations with landowners over any land rights they require. Our Agents have advised there are various aspects to these negotiations which are reasonable comprises by the landowner, that National Grid is currently not agreeing to.	See Appendix A: AP 197 - Hugh French / Guy French / Rockbroon Ltd / James French / E French & Sons
Hugh French / Guy French / James French	2746	Yes	All of the above	All	Both	We object to land or rights being compulsory acquired. National Grid should engage in meaningful negotiations with landowners over any land rights they require. Our Agents have advised there are various aspects to these negotiations which are reasonable comprises by the landowner, that National Grid is currently not agreeing to.	See Appendix A: AP 198 - Hugh French / Guy French / James French

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
East Anglia One Limited	13598	Yes	All of the above	B-20/174, B-20/179, B-20/181, B-20/182, B-20/183, B-20/185, B-20/191, B-20/195, B-20/197, B-20/199, B-20/202, B-20/204, B-20/205.	National Grid	Note plot B-20/180 appears to be marked for compulsory acquisition on EN020027-002892-2.2 Land Plans – Section B, Revision C however is not marked for compulsory acquisition under the Book of Reference, this is to be clarified. In any event, it is marked in the Book of Reference for temporary possession, to which we object. East Anglia One Limited (“EA1L”) is the developer of a consented Nationally Significant Infrastructure Project offshore wind generation and associated onshore transmission infrastructure, and is directly affected by the Proposed Development. NGET seek CA and TP powers over land owned by ScottishPower Renewables (UK) Limited (“SPRUKL”), EA1L's direct owner, in which EA1L has various rights and generation assets within EA1’s substation compound. The compulsory acquisition and temporary possession of land owned by SPRUKL, in combination with powers sought under Articles 14 and 16 of the draft DCO to temporarily close Bullen Lane, would put EA1, a critical national infrastructure project, at risk. Bullen Lane is the only access road leading to the EA1 substation, where EA1L still holds generation assets within. It is therefore vital that 24/7 uninterrupted access to the EA1 substation via Bullen Lane is maintained for fire and safety reasons, as well as to ensure the continued maintenance of the EA1 substation, which are vital parts of the overall EA1 windfarm operation. While EA1L does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests. EA1L’s position is that the Applicant has not demonstrated that the extent of CA and TP powers being sought, which would allow the Applicant to exclude EA1L from using Bullen Lane, the access road to the EA1 substation, rights is necessary. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified restrictions on EA1L's ability to access, operate and maintain its infrastructure. The principles underlying Section 127 of the Planning Act 2008 are also engaged, given the nature of EA1L's infrastructure as nationally important critical energy infrastructure. Those principles require that the Secretary of State cannot authorise the compulsory acquisition of statutory undertakers' land where this would cause serious detriment to the carrying on of the undertaking. EA1 holds an interest in the listed plots for the purposes of carrying on the operation of the EA1 offshore windfarm. EA1 is significantly concerned that the Proposed Development will result in serious detriment to the carrying on of the operation of the EA1 offshore windfarm by restricting access to the EA1L's generation assets within the EA1 substation for maintenance and emergency works, increasing safety risks and imposing operational inefficiencies. The EA1 generation assets within the substation are a vital part of the overall windfarm operation, which is wholly dependent on the operation and function of the EA1 substation.	See Appendix A: AP 199 - East Anglia One Limited
Margaret Eileen Hamilton	9148	Yes	All of the above	ALL	Both	The recent paperwork appearing to outline plans for compulsory acquisition & holding by the operator after the construction project, when typically landowners provide easement rights for access and maintenance, requires clarification on case-by-case basis because CA of significant areas of land will affect agricultural activities for many parties including ourselves.	See Appendix A: AP 200 - Margaret Eileen Hamilton
Stephen Chantry	1857	Yes	All of the above	ALL	Both	apart from all the objections with regards the desecration of the countryside, wildlife, our family home worth nothing, the affects on the local community whilst work is carried out, road capabilities as we are always having floods, and that none of our concerns are looked into by national grid???, there are better ways underground or offshore SITE SPECIFIC OBJECTIONS: national grids plans show that part of our garden/paddock lie just east of TB207 , This is a area where there are ancient oaks,centuries old supporting a large range of wildlife, they are irreplaceable part of the local ecosystem. IMPACT ON STABLES AND HORSE WELFARE: near the affected area there are stables, during construction it would impact and distress the horses, noise, vibration and site activity could be disastrous. national grid have failed to demonstrate the need, the applicants justification under NPS EN-1 AND EN5 is weak. They have not adequately consider alternatives, use existing power lines or update them, go underground, offshore???. ECOLOGY AND BIODIVERSITY , this has not been taken into consideration. Landscape and Heritage: We live in a listed building and the land is in the curtilage of this, placing a 50 metre pylon will totally obliterate the whole point of importance in the heritage and listed system. My family have all been affected by this proposal, my wife stressed and anxious now taking medication how can this be fair?. As far as ED miliband criticising (NIMBYs) as he calls people it has now come to light that his own wife fought against a proposal that would affect their home and it is not going ahead now??? how two faced is that. PLEASE RE THINK THIS SCHEME. KIND REGARDS STEPHEN CHANTRY	See Appendix A: AP 201 - Stephen Chantry
LIH Dunton Hills Limited (c/o Agents BTSurveyors)	29095	Yes	Compulsory Acquisition of rights,Temporary possession	All, excluding plot 6/127	National Grid	This response is a summary of LIH Dunton Hills Ltd's (LIH) position on interference with its land interests. A fuller explanation of these issues is set out in the Representations dated November 2025 submitted by BTS on behalf of LIH. LIH's primary concern relates to the proposed CA of rights for the works relating to Pylon TB 229 (in particular, plot G-6/133). As currently proposed, rights are sought over a wide area, and the exercise of the rights risks sterilising some land intended for residential development, and therefore may impact on the delivery of LIH's Dunton Hills Garden Village (DHGV) project. This potential conflict between the NTT project and LIH's developable land, and the extent of the interference with LIH's interests, is disproportionate and is not properly justified. This is particularly the case given that, based on discussions between the Applicant and LIH, design solutions may be available which would limit the impact on LIH's interests. LIH welcomes the engagement of the Applicant and progress towards agreeing Heads of Terms for an agreement between the parties. The agreement is expected to include obligations which seek to address LIH's concerns through the detailed design process, including reviewing the works and location for Pylon TB229 to avoid or minimise material impacts on DHGV. Until terms are agreed, LIH maintains its objection to the proposed CA powers. LIH does not object to the CA powers sought for diversion of the UKPN overhead 132 kV cables (PSC 3-7) but still intends to agree terms for voluntary acquisition of those rights.	See Appendix A: AP 202 - LIH Dunton Hills Limited (c/o Agents BTSurveyors)
SBS Spares Ltd	3623	Yes	All of the above	All	Both	We object to the rights being taken by compulsion. We are not against entering into a voluntary agreement and commencing in commercial negotiations with UK Power and /or National Grid or their agents. As you are aware we have appointed Landbridge land agents, Rivers Court, High Street, Sproughton, Ipswich IP8 3AP to act on our behalf. Future correspondence on this should be directed to them FAO Will Barton	See Appendix A: AP 203 - SBS Spares Ltd

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Bianca Moller Robert Moore	4235	Yes	All of the above	All	Both	I object to the proposed project for the following reasons: 1)Failure to properly consider alternatives to pylons The applicant has failed to adequately consider alternatives to the use of pylons for this project. Less intrusive options appear to exist, but these have not been properly assessed, explained, or justified. 2)Failure to consider less harmful alternatives The proposal does not demonstrate that the least damaging or least intrusive option has been selected. The applicant has not shown that alternative routes, technologies, mitigation measures, or methods of delivery have been fully explored in order to reduce the impact on affected landowners, businesses, homes, and livelihoods. 3)Disproportionate private loss and human rights impact The proposed project would cause very significant private loss and would have a serious impact on the rights and livelihoods of affected landowners and businesses. In our case, the proposed power lines would cross our farm and would cause substantial harm to our business, including the destruction of a wedding venue, which is the small farm's main source of income. This impact is severe, personal, and disproportionate. The harm to land, businesses, income, and way of life outweighs any public benefit that the applicant claims would arise from the project. 4)Lack of a compelling case in the public interest The applicant has failed to demonstrate a compelling case in the public interest for this project in its proposed form. There has been insufficient justification for why the project must proceed using pylons, why this route has been selected, and why less intrusive alternatives have not been pursued. 5)Insufficient pre-application work and inadequate consultation Prior to submitting the DCO application, the applicant failed to carry out sufficient detailed preparatory work, particularly in relation to consultation and engagement with affected landowners. 6)We have been trying to address the issue of the proposed power lines crossing our farm with the applicant for three years. Despite this, we have received limited feedback and there has been no meaningful progress towards resolving our concerns. This demonstrates inadequate engagement, poor communication, and a failure to properly consult with those most directly affected. 7)Inadequate engagement and negotiation The applicant has not engaged with us in a constructive or meaningful way. Given the scale of the impact on our farm and business, we would have expected detailed discussions, proper negotiation, and genuine attempts to reduce or avoid the harm caused. This has not happened. I imagine many other businesses / farms have similar concerns 8)Compensation concerns We have serious concerns about whether affected parties will receive fair, adequate, and timely compensation. The damage to our business and livelihood would be substantial, and to date there has been no communication from the applicant about how losses will be assessed, how compensation will be calculated, and when compensation would be paid. 9)No heads of terms or voluntary agreement No heads of terms or voluntary agreement has been signed. This is due to the lack of meaningful engagement and negotiation by the applicant. The absence of agreed terms further demonstrates that the applicant has not properly addressed the impact of the project on our land and business. For these reasons, I object to the application. I ask that the Examining Authority gives significant weight to the severe impact on our farm, business, livelihood, and property rights, and requires the applicant to properly consider less intrusive alternatives before any consent is granted.	See Appendix A: AP 204 - Bianca Moller Robert Moore
Jeremy Nicholas John Sheppard	2976	Yes	All of the above	F-6/24, F-6/27	Both	My wife and I own the freehold on Braddocks, a residential property situated on Mashbury Road, Chignal St James. The property is approximately 160 metres north of the proposed line of pylons and a crossing point for the haul road. Two plots of land on the property are the subject of compulsory acquisition. Firstly, a narrow strip of land forming the roadside margin which has been aggregated with other land to form plot F-6/24. Secondly, an area of approximately 72 sq metres contained within the boundary of the property, forming plot F-6/27. We contributed to both the statutory and landowner consultations and met with representatives of the applicant's agents, Fisher German, on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed compulsory acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure – primarily a water main, hydrant point, culverted land drain and overhead telephone and fibre optic cables which all lie within the boundary of plot F-6/24. Fisher German assured us the requests had been passed back to the applicant however we have never received a response. With no response, the applicant has so far failed to provide any justification for seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives, including temporary rights of access, (Guidance para 8) and has failed to explain how the rights over the land will be used (Guidance para 9). We also have more specific concerns about the impact of the proposed permanent rights and how they interfere with our property. Plot F-6/24 : Properties on Mashbury Road are not connected to mains drainage. Treated effluent from Braddocks is discharged into the culverted drain within plot F-6/24. The permanent rights sought under Class 4 (g) and (h) can be used to render the property uninhabitable by allowing the applicant to prevent the removal of effluent from the property by decommissioning the drain and forbidding its replacement. This infringes on our Article 8 and Protocol 1 Article 1 rights under the ECHR. Plot F-6/27 : This comprises two sections, 1) a narrow strip within which there is a mature 8 foot high mixed hawthorn hedge fronting onto Mashbury Road and some mature fruit trees within the garden itself, and 2) a surfaced area between Mashbury Road and the gate to Braddocks which comprises the primary access point to the property. The hedge provides security and privacy to the property however the permanent rights sought under Class 4 (b) and (e) would allow the applicant to require its removal and forbid any replacement. In the document Ref EN020027, submitted by the applicant, covering tree and hedgerow management all fruit trees in the garden are marked as "unaffected" and the hawthorn hedge is only classed as "potentially affected". This strongly indicates that the permanent rights sought are unnecessary, the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient. In respect of the primary access to the property, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent rights sought is grossly disproportionate for this residential property. They constitute a disproportionate and severe infringement of our rights under Article 8 and Protocol 1 Article 1 of the ECHR (Guidance para 10) and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.	See Appendix A: AP 205 - Jeremy Nicholas John Sheppard

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Susan Jane Sheppard	1772	Yes	All of the above	F-6/24, F-6/27	Both	My husband and I own the freehold on Braddocks, a residential property situated on Mashbury Road, Chignal St James. The property is approximately 160 metres north of the proposed line of pylons and a crossing point for the haul road. Two plots of land on the property are the subject of compulsory acquisition. Firstly, a narrow strip of land forming the roadside margin which has been aggregated with other land to form plot F-6/24. Secondly, an area of approximately 72 sq metres contained within the boundary of the property, forming plot F-6/27. We contributed to both the statutory and landowner consultations and met with representatives of the applicant's agents, Fisher German, on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed compulsory acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure – primarily a water main, hydrant point, culverted land drain and overhead telephone and fibre optic cables which all lie within the boundary of plot F-6/24. Fisher German assured us the requests had been passed back to the applicant however we have never received a response. With no response, the applicant has so far failed to provide any justification for seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives, including temporary rights of access, (Guidance para 8) and has failed to explain how the rights over the land will be used (Guidance para 9). We also have more specific concerns about the impact of the proposed permanent rights and how they interfere with our property. Plot F-6/24 : Properties on Mashbury Road are not connected to mains drainage. Treated effluent from Braddocks is discharged into the culverted drain within plot F-6/24. The permanent rights sought under Class 4 (g) and (h) can be used to render the property uninhabitable by allowing the applicant to prevent the removal of effluent from the property by decommissioning the drain and forbidding its replacement. This infringes on our Article 8 and Protocol 1 Article 1 rights under the ECHR. Plot F-6/27 : This comprises two sections, 1) a narrow strip within which there is a mature 8 foot high mixed hawthorn hedge fronting onto Mashbury Road and some mature fruit trees within the garden itself, and 2) a surfaced area between Mashbury Road and the gate to Braddocks which comprises the primary access point to the property. The hedge provides security and privacy to the property however the permanent rights sought under Class 4 (b) and (e) would allow the applicant to require its removal and forbid any replacement. In the document Ref EN020027, submitted by the applicant, covering tree and hedgerow management all fruit trees in the garden are marked as "unaffected" and the hawthorn hedge is only classed as "potentially affected". This strongly indicates that the permanent rights sought are unnecessary, the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient. In respect of the primary access to the property, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent rights sought is grossly disproportionate for this residential property. They constitute a disproportionate and severe infringement of our rights under Article 8 and Protocol 1 Article 1 of the ECHR (Guidance para 10) and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.	See Appendix A: AP 206 - Susan Jane Sheppard
Alex Haden - BTSurveyors Ltd - Representative of Orsett Golf Club	10292	Yes	All of the above	All	Both	The grounds for objection have been outlined in our previous Representations on behalf of Orsett Golf Club (November 2025 & February 2026) . We are in ongoing, discussions with National Grid and their appointed agents with a view to covering outstanding matters within a confidential Heads of Terms Agreement.	See Appendix A: AP 207 - Alex Haden - BTSurveyors Ltd - Representative of Orsett Golf Club
Monika Weglarz, TLT on behalf of Basildon BESS Ltd	27173	Yes	Compulsory Acquisition of rights	H-1/1, H-1/5	Both	Basildon BESS Ltd has previously stated, in its relevant representation [RR-0334], its written representation [REP1-203] and at the compulsory acquisition hearing on 29 April, that it has an installation, on leased land, in parts of plots H-1/1, H-1/5 and H-1/11 comprising of an operational Battery Energy Storage System to the north of the UKPN substation. Basildon BESS has been liaising with the Applicant in respect of these plots and the interests that are sought over them and during these discussions it has become apparent that Basildon BESS does not have an interest in plot H-1/11. In respect of the remaining two plots, the parties have recently agreed the wording of a side agreement. However, the agreement has not yet reached completion and, until such a time as it does, Basildon BESS maintains its strong objection to the Applicant's proposals in their current form.	See Appendix A: AP 208 - Monika Weglarz, TLT on behalf of Basildon BESS Ltd
TC East Anglia One OFTO Limited	13598	Yes	All of the above	B-20/199, B-20/179, B-20/191, B-20/195, B-20/209, B-20/174, B-20/180, B-20/182, B-20/196, B-20/197, B-20/204, B-20/205, B-20/214	Both	Please note that TC East Anglia One OFTO Limited leases land and benefits from rights in adjoining land, but they do not feature in the Book of Reference. We are wrongly not detailed in this document [Book of Reference]. This needs to be rectified as it has been raised previously. [See previous submissions]	See Appendix A: AP 209 - TC East Anglia One OFTO Limited
PACE Nano Energy Limited	15947	Yes	Compulsory Acquisition of rights, Temporary possession	All	National Grid	Until such time as the Commercial Agreement between PACE Nano Energy Ltd and NGET is executed, PACE objects to the compulsory acquisition of its rights and interests in land and the temporary use of the land it holds an interest in. Once completed, the terms of the Commercial Agreement will resolve PACE's concerns with the interference of its rights and following which PACE Nano will withdraw its objection. PACE refers to its previous submissions in this examination ([REP-2789], [REP1-264], [REP3-129] and [REP5-261]) and the draft Statement of Common Ground ([REP4-227]) between the parties for context of the issues and reasons for objection.	See Appendix A: AP 210 - PACE Nano Energy Limited
Gillian Ann Whittle	3768	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights, All of the above, Temporary possession	C-49/9 and C-14/10	Both	Neither NG nor UK Power Networks have need or necessity for these rights over our land. The impact would be disproportionate, and there has been a severe lack of communication and negotiation to acquire any such rights at any point. Communication from NG or Fisher German has been absolutely zero since a meeting with them on 19th June 2024, when they promised to be in touch with answers within a couple of weeks. Their lack of engagement with people and communities in these circumstances has been wholly inadequate, despite NG's claims to have communicated fully.	See Appendix A: AP 211 - Gillian Ann Whittle
Nicola Jane Underwood	16149	Yes	All of the above	All	Both	My husband and I purchased a very small piece of land behind our house, [REDACTED] from Writtle Agricultural College in December 2016. We have tried to inform you on several occasions that we do not think that our land is part of this process and we do not own any other land in this area and certainly have no knowledge of ownership of the 13 parcels of land that appear on your document REP4-051 in our names. We believe these parcels of land probably do, or used to belong to Writtle Agricultural College. We have been unable to identify our land as being listed on the document REP4-051 at all. Our TP1 form location map shows a Search Reference of: 1617_00939 and the Property Address as: [REDACTED]	See Appendix A: AP 212 - Nicola Jane Underwood

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Stephen Hilary Underwood	16148	Yes	All of the above	All	Both	My wife and I purchased a very small piece of land behind our house, [REDACTED] from Writtle Agricultural College in December 2016. We have tried to inform you on several occasions that we do not think that our land is part of this process and we do not own any other land in this area and certainly have no knowledge of ownership of the 13 parcels of land that appear on your document REP4-051 in our names. We believe these parcels of land probably do, or used to belong to Writtle Agricultural College. We have been unable to identify our land as being listed on the document REP4-051 at all. Our TP1 form location map shows a Search Reference of: 1617_00939 and the Property Address as: [REDACTED]	See Appendix A: AP 213 - Stephen Hilary Underwood
Bank of Ireland UK Plc	24735						See Appendix A: AP 214 - Bank of Ireland UK Plc
Tessa Saunders / Anglian Water Services Limited	10188	Yes	Compulsory Acquisition of rights, Temporary possession	A-3/6, A-7/20, A-7/30, A-13/68, A-13/69, A-13/70, C-17/36, C-17/37, C-17/57, C-17/60, C-17/69, C-17/66, C-17/72, C-17/74, C-17/76, C-17/79, C-17/80, C-17/81, C-17/86, G-3/3, G-3/7, G-3/21, G-3/22, G-3/27, G-3/28, G-3/33, G3-3/34, G-3/38, G-3/42	Both	Anglian Water Services Limited (AWSL) is raising objections to those plot numbers where we have a freehold interest and matters are not resolved in respect of compulsory acquisition of rights over our land assets or temporary use. This includes our following assets: Land at Bracon Ash; Forncett End water recycling centre (WRC); Roydon-Barnards Lane Pumping Station, Bressingham Road; Land at Ardleigh – Dedham Road; Ardleigh-Wick Lane Reservoir; Shenfield and Hutton WRC. These matters are listed in the draft Statement of Common Ground between the Applicant and AWSL [REP4-101], as matters under discussion. Whilst AWSL has a large number of assets (i.e. sewers and water mains) on plots where our land interest is identified as 'occupation' these interfaces will be addressed through the bespoke Protective Provisions for Anglian Water, which are substantively agreed, but not yet included on the face of the draft Development Consent Order (DCO). The compulsory acquisition of rights and temporary use of our land is still under discussion with the Applicant. Shenfield and Hutton WRC: AWSL's agents, Savills, are awaiting a date for a site visit with National Grid's contractors to discuss mitigations of the proposed access route. Forncett End WRC: AWSL is progressing the phosphorus and nitrogen removal schemes due for delivery at the WRC by 31 March 2030. This will assess the alternative land offered by the Applicant. Ardleigh-Wick Lane Reservoir: The Applicant held a meeting with AWSL and Affinity Water to discuss the proposals including overhead line and easement across the reservoir and UKPN diversion works. A Land Disposal Risk Assessment has been prepared and circulated for review. Our Estates Partner, Savills, is liaising with the Applicant's Lands Team on a number of these interfaces. For each location a Land Disposal Risk Assessment is being prepared. When Anglian Water disposes of any property, whether freehold, leasehold or an easement right, the Estates Partner uses the Land Disposal Risk Assessment (LDRA) to document and confirm approval of the proposal. This ensures that the relevant stakeholders have been consulted and that any potential issues are identified and appropriately mitigated. The four stakeholders that are consulted are the Site Manager of the affected property, who reviews whether the proposal impacts the day-to-day operation of the site; the Asset Delivery Planning team, who assess whether there are any future schemes planned for the site that may be affected by the proposal; the Biodiversity Team, who review any potential impacts on Anglian Water's environmental commitments, particularly in relation to Biodiversity Net Gain; and the Estates team, who consider any estate-related matters such as covenants or existing agreements affecting the land parcel in question. Both the Site Manager and Asset Delivery Planning teams are consulted to review the impact of the proposal on Anglian Water's duties as a statutory undertaker, both now and in the future. In respect of Ardleigh in this example, AVH Parks, who manage the recreational activities on behalf of Anglian Water, will also be consulted and included within the LDRA process. For example, where a commercial activity may be affected by a compulsory purchase proposal, mitigation may include a business loss claim. If all relevant stakeholders agree to the proposal and the associated mitigation measures, the matter is then referred to the Commercial Team, who manage the Estates Partner function within Anglian Water, to provide final approval. This process ensures that all affected stakeholders have formally confirmed their approval of the proposal. The approved Land Disposal Risk Assessment then forms part of the legal instruction to Anglian Water's in-house legal department, who will complete the relevant agreement with support from the Estates Partner. This process will help inform ongoing discussions with the Applicant.	See Appendix A: AP 215 - Tessa Saunders / Anglian Water Services Limited

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Ian Nicholas Thomson	5342	Yes	All of the above	All	Both	Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: •There must be a compelling case in the public interest for compulsory acquisition. •The land or rights sought must be necessary for the development. •The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: •Severe disruption to farming operations •Safety risks arising from construction routes •Loss of residential amenity •Interference with existing infrastructure and utilities •Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: •National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. •Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, •haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and •the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: •Permanent disruption of agricultural land where temporary access could achieve the same objective •Overly wide or intrusive haul roads •Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: •The scheme imposes significant and concentrated burdens on specific landowners and communities •These burdens are not adequately mitigated or justified by the chosen route •The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: •A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors •Use of existing redundant pylon routes instead of constructing entirely new infrastructure •Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition.	See Appendix A: AP 216 - Ian Nicholas Thomson

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: •Residential impact: properties becoming unlettable due to proximity to haul roads •Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access •Community disruption: interference with footpaths, local routes, and daily activities •Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment •Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: •The consultation process fell short of statutory requirements •There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts •Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: •The Secretary of State cannot be satisfied that all relevant considerations have been taken into account •The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: •Negotiations have been ongoing for several years without resolution •Landowners have not been provided with final or clear terms •NG will not engage with landowners suggestions of even minor changes/ameliorations •The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: •Compulsory acquisition powers are being used prematurely •The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: •Insufficient detail on infrastructure such as bridges across flood-prone areas •Construction proposals that are impractical or unsafe •Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) •Land and rights are broader than required •Alternatives exist that would reduce land-take •The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) •Impacts on landowners are severe and disproportionate •Consultation and alternatives analysis are inadequate •Negotiation efforts have been insufficient •The balance between public benefit and private harm is not properly justified 9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: •The extent of compulsory acquisition is not fully justified •Less intrusive alternatives have not been adequately considered •The impacts on affected landowners and communities are excessive •Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met.	

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						To proceed lawfully, National Grid need to: •Demonstrate genuine optimisation of the route and access arrangements •Provide clear evidence of alternatives being properly assessed •Engage meaningfully with affected parties •Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	
Carolyn Gordon / Northumbrian Water Ltd	10192	Yes	All of the above	H-1A/1, H-1A/2, H-1A/4, H-1A/5, H-1A/6, H-1A/11, H-1A/12, H-1A/14	Both	REP4-381, REP5-279 NWL have undertaken an initial and high-level desktop study and have identified a number of key or strategic assets that are shown to be within the revised red line boundary of the Proposed Scheme. Further engagement is required to understand the impact on NWLs assets before removing any objection to the proposed limit changes.	See Appendix A: AP 217 - Carolyn Gordon / Northumbrian Water Ltd
Julie Russell on behalf of National Highways Limited	10201	Yes	All of the above	All plots to which National Highways have an interest	Both	1.Overview of NH's Objection 1.1NH objects to the compulsory acquisition ("CA") and temporary possession ("TP") powers sought over approximately 154 plots of land owned or occupied by NH for the purposes of its statutory undertaking as strategic highway authority. NH's core submission is that the inclusion of these plots in the Book of Reference is neither necessary nor proportionate, and that the statutory tests for authorising compulsory acquisition are not met. 2.Overview of NH's Objection 2.1Under section 122 of the Planning Act 2008, an order granting development consent may include provision authorising compulsory acquisition of land only if the Secretary of State is satisfied that the land is (a) required for the development to which the development consent relates, (b) required to facilitate or is incidental to that development, or (c) replacement land given in exchange. Under section 123, there must be a compelling case in the public interest for the land to be acquired compulsorily, taking into account the availability of alternatives and proportionality. 2.2The DCLG Guidance (September 2013) elaborates on these tests, emphasising that the applicant must demonstrate that the land sought is necessary (i.e., no more land is included than is reasonably required) and that the proposed interference is proportionate to the objectives of the scheme. 3.NH's Specific Grounds of Objection 3.1Compulsory Acquisition of Operational Land is Not Necessary 3.1.1NH submits that the plots in question constitute operational land acquired for the purpose of maintaining its statutory undertaking. NH identifies that the permanent land take plots fall into two principal categories: ☐ Land which is currently NH-managed highway and is required for highway works to the Strategic Road Network ("SRN") or widening works as part of the Applicant's proposals. Such works are already authorised by the DCO subject to protective provisions, and therefore CA is unnecessary. ☐ Land which is not highway but is owned by NH and is required for SRN widening as part of the Applicant's proposals. This land does not need to be acquired only to be transferred back to NH; access can be granted through protective provisions and by agreement. 3.1.2NH contends that there is no need for plots in either category to be compulsorily acquired, as they are either already part of the SRN or land that will become part of the new SRN. Their inclusion in the Book of Reference is therefore not necessary or proportionate as required by the Planning Act CA Guidance. 3.2Acquisition of Rights is Not Necessary 3.2.1Regarding the acquisition of rights (principally for overhead lines and underground cabling), NH submits that the majority of plots relate to operational highway forming part of the SRN. NH argues that rights are not in fact required because National Grid already possesses statutory powers under the New Roads and Street Works Act 1991 to install, maintain, and repair apparatus in a public highway, with section 105 of that Act confirming that references to "in" a highway include works under, over, across, along or upon it. Accordingly, National Grid can undertake overhead line works without CA, and the inclusion of these plots is again not necessary or proportionate as required by the CA Guidance. 3.2.2Where an underground cable may require an easement, NH is prepared to grant that easement by consent and is willing to negotiate terms, further obviating the need for compulsory powers. 3.2.3Discussions with the Applicant as to the appropriateness of the utilising the powers in the New Roads and Street Works Act 1991 are on going. NH hope to be in a position to provide an update in the above regard at CAH3 which is due to be held on 24 June. 3.3Section 127: Serious Detriment to the Undertaking 3.3.1 NH also relies on section 127 of the Planning Act 2008, which provides that an order granting development consent may only include provision authorising the CA of statutory undertakers' land to the extent that the Secretary of State is satisfied that the land can be purchased and not replaced without serious detriment to the carrying on of the undertaking, or can be replaced without such detriment. NH submits that if its operational land were compulsorily acquired, it could cause serious detriment to the safe and efficient operation of the SRN, as NH needs to remain in control of its highway and subsoil. 3.4 Historic Ownership Plots 3.4.1 NH notes that certain plots where rights are sought relate to roads that have been detrunked, meaning ownership has in fact passed to the local authority but the transfer has not been registered at the Land Registry. As this land is non-operational, NH can agree to transfer any interest it retains by agreement, and CA is therefore not necessary. 4. Summary and Conclusion 4.1 In essence, NH's objection rests on the proposition that the tests of necessity and proportionality under sections 122 and 123 of the Planning Act 2008 and the DCLG Guidance are not satisfied, because the Applicant can achieve its objectives without compulsory acquisition — either through existing statutory powers, protective provisions, or voluntary agreement. Additionally, the serious detriment test under section 127 presents a further barrier to the acquisition of NH's operational land.	See Appendix A: AP 218 - Julie Russell on behalf of National Highways Limited

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Rosemary Carol Thomson	7272	Yes	All of the above	All	Both	Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: •There must be a compelling case in the public interest for compulsory acquisition. •The land or rights sought must be necessary for the development. •The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: •Severe disruption to farming operations •Safety risks arising from construction routes •Loss of residential amenity •Interference with existing infrastructure and utilities •Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: •National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. •Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, •haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and •the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: •Permanent disruption of agricultural land where temporary access could achieve the same objective •Overly wide or intrusive haul roads •Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: •The scheme imposes significant and concentrated burdens on specific landowners and communities •These burdens are not adequately mitigated or justified by the chosen route •The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: •A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors •Use of existing redundant pylon routes instead of constructing entirely new infrastructure •Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition.	See Appendix A: AP 219 - Rosemary Carol Thomson

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						4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: •Residential impact: properties becoming unlettable due to proximity to haul roads •Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access •Community disruption: interference with footpaths, local routes, and daily activities •Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment •Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: •The consultation process fell short of statutory requirements •There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts •Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: •The Secretary of State cannot be satisfied that all relevant considerations have been taken into account •The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: •Negotiations have been ongoing for several years without resolution •Landowners have not been provided with final or clear terms •NG will not engage with landowners suggestions of even minor changes/ameliorations •The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: •Compulsory acquisition powers are being used prematurely •The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: •Insufficient detail on infrastructure such as bridges across flood-prone areas •Construction proposals that are impractical or unsafe •Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) •Land and rights are broader than required •Alternatives exist that would reduce land-take •The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) •Impacts on landowners are severe and disproportionate •Consultation and alternatives analysis are inadequate •Negotiation efforts have been insufficient •The balance between public benefit and private harm is not properly justified	

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: •The extent of compulsory acquisition is not fully justified •Less intrusive alternatives have not been adequately considered •The impacts on affected landowners and communities are excessive •Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: •Demonstrate genuine optimisation of the route and access arrangements •Provide clear evidence of alternatives being properly assessed •Engage meaningfully with affected parties •Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	
Christopher Edward Broom	20000	Yes	All of the above	All	National Grid	Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: •There must be a compelling case in the public interest for compulsory acquisition. •The land or rights sought must be necessary for the development. •The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: •Severe disruption to farming operations •Safety risks arising from construction routes •Loss of residential amenity •Interference with existing infrastructure and utilities •Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: •National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. •Certain areas appear to be included for flexibility or convenience rather than strict necessity.	See Appendix A: AP 220 - Christopher Edward Broom

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						This is especially evident in relation to, •haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and •the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: •Permanent disruption of agricultural land where temporary access could achieve the same objective •Overly wide or intrusive haul roads •Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: •The scheme imposes significant and concentrated burdens on specific landowners and communities •These burdens are not adequately mitigated or justified by the chosen route •The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: •A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors •Use of existing redundant pylon routes instead of constructing entirely new infrastructure •Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: •Residential impact: properties becoming unlettable due to proximity to haul roads •Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access •Community disruption: interference with footpaths, local routes, and daily activities •Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment •Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: •The consultation process fell short of statutory requirements •There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts •Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: •The Secretary of State cannot be satisfied that all relevant considerations have been taken into account •The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: •Negotiations have been ongoing for several years without resolution •Landowners have not been provided with final or clear terms •NG will not engage with landowners suggestions of even minor changes/ameliorations •The promoter continues to revise fundamental aspects such as the basis of compensation claims	

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						This raises concerns that: •Compulsory acquisition powers are being used prematurely •The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: •Insufficient detail on infrastructure such as bridges across flood-prone areas •Construction proposals that are impractical or unsafe •Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) •Land and rights are broader than required •Alternatives exist that would reduce land-take •The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) •Impacts on landowners are severe and disproportionate •Consultation and alternatives analysis are inadequate •Negotiation efforts have been insufficient •The balance between public benefit and private harm is not properly justified Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: •Demonstrate genuine optimisation of the route and access arrangements •Provide clear evidence of alternatives being properly assessed •Engage meaningfully with affected parties •Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge. 9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: •The extent of compulsory acquisition is not fully justified •Less intrusive alternatives have not been adequately considered •The impacts on affected landowners and communities are excessive •Procedural shortcomings undermine confidence in the scheme	

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Vicky Fowler on behalf of Bloor Homes Limited	10163	Yes	Compulsory Acquisition of land,Temporary possession	6/71, 6/71a and 6/71b.	Both	The current scope of Bloor Homes objection relates to land parcels at Chadwell St Mary. In particular plots 6/71, 6/71a and 6/71b. Bloor has an option over this land and is promoting a planning application for the development of up to 1,500 dwellings, together with education, health and retail uses. The land forms part of a growth area proposed by Thurrock Borough Council for the delivery of up to 4,000 homes, and plays a key role in meeting the Borough's housing delivery targets. The Bloor scheme will be delivered in phases and start on site is anticipated in 2029. Taking the parcels in turn: Land Parcel 6/71a: This is a strip of land adjacent to Brentwood Road (coloured brown and referenced 6/71a in the Land Plans). NGET is proposing a compulsory acquisition of this land to provide its temporary and permanent access. This strip of land will be fundamental to the Bloor scheme as it will contain the proposed access to residential development parcels off Brentwood Road and overlaps with the first area for development adjacent to the site entrance. This strip is excessively wide. Bloor has sought comfort that NGET will not require the full extent of this land and was hoping for the land plans to be scaled back. Bloor have also sought comfort that it will be able to construct the permanent access and lay services as required and commence building within Area A as shown on the plan appended to the Statement of Common Ground submitted at deadline 1 [REP1-083]. Land Parcels 6/71 and 6/71b Bloor has concerns regarding the other land coloured brown on the Land Plans, including parcels 6/71 and 6/71b. Should these be fully acquired by NGET, this would have very significant adverse consequences for the Bloor scheme. It is Bloor's understanding, through discussions with NGET, that a relatively small proportion of the brown land is actually required for For all 3 parcels, it is Bloor's view that compulsory acquisition is not necessary, and instead Bloor (or the landowner ahead of Bloor's acquisition) could retain the land and grant NGET rights as necessary. Moreover, permanent access to NG apparatus ought to be capable of taking place over the estate roads once constructed. Negotiations with the Applicant have been positive and the dropping of option A is helpful to Bloor. The Statement of Common Ground ("SoCG"), submitted at deadline 1, records agreement on several key matters, including: •that NGET will only implement land and property rights to the extent actually required; •that the NGET permanent access route can be varied to be routed through the Bloor Scheme; •the broad location for a construction access preferred by both parties to the north of the main access to the residential development; •an understanding that restrictions on built development in certain areas are not intended to prevent Bloor's enabling works; and a commitment to exploring opportunities for shared facilities and materials. Bloor objects to both the compulsory acquisition ("CA") and temporary possession ("TP") powers sought by NGET in respect of the Bloor Scheme land, to the extent that these are not reduced in size, changed to temporary or regulated by a binding legal agreement to reflect the commitments given. Bloor would still like to see the land plans amended and a commitment to locate the permanent overhead line as far north in the site as possible. Importantly the commitments set out in the SoCG need to be secured in a legal agreement. Bloor have received heads of terms for such an agreement and understand that the negotiation of the agreement will progress with the aim of completing the same during the Examination. Taken at face value, the Land Plans suggest a fundamental constraint to the Bloor scheme and if the permanent acquisition was simply exercised without regard to the agreed matters then that would remove the access to a strategic housing site.	See Appendix A: AP 221 - Vicky Fowler on behalf of Bloor Homes Limited

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Claire Lincoln-White	2859	Yes	All of the above	ALL	Both	We own the freehold on Brittons Hall Farm, a residential property situated on Mashbury Road. The property is situated next to a field which is planned by NG for the situation of a pylon and a crossing point for the haul road. There are F-6/40/46/47/49/50/54. We met with representatives of the applicants agents on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure and access to the property but have not received a response. With no response, the applicant has so far failed to provide any justification for temporary right nor seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives and has failed to explain how the rights over the land will be used (Guidance para 9). In addition, the applicant has not explained why there needs to be access at night and failed to explain how our property will remain safe, secure and private. Specific concerns which have not been responded to by the applicant are:1) the boundary of the garden and the field onto which the haul road will be build is not clear. The option area shaded seems to include part of the field which does not belong to the property. 2) the purpose of acquiring the garden is not clear, even on a temporary basis. The haul road is not being built on it. There are mature trees and hedges at the end of this section backing onto the field where the haul road will be situated and onto Mashbury Road. This provides not only habitats for wildlife but also security and privacy for the property. Fisher German have said they are not clear what this land will be intended to be used for but speculated it is for visibility for traffic from the haul road crossing Mashbury Road. We have asked why they cannot consider traffic lights or moving the haul road slightly further away from the boundary of the property into the field which is already impacted as alternatives to negate the need for the acquisition and destruction on boundary trees/hedges. 3) It is not clear whether current access to the property will be impacted by proposed acquisitions. 4) Asked what provisions they will make to ensure our property is kept safe and secure if work goes ahead and if access if granted during the day or night. 5) It is not clear how overhead lines / telecom lines will be impacted and where they will occupy air space in and around the property or whether they are likely to be buried underground. 6) We rely on non-fibre wifi which is delivered via antenna on our property. Electricity pylons and overhead lines can interfere with this and we've asked for how this would be addressed. The applicant has said the plots 'may be affected' but cannot explain how, have not considered alternatives and have failed to outline how our property (and its occupants) would remain safe, secure and have privacy during any works and afterwards, where applicable. This strongly indicates the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient, and have insufficiently considered why permanent / temporary access is required at all, particularly in relation to the garden. In respect of the primary access, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control land close to the access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent and temporary rights sought, constitute a disproportionate and severe infringement of our rights under Articles 1 and 8 of the ECHR and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.	See Appendix A: AP 222 - Claire Lincoln-White
Richard White	8024	Yes	All of the above	ALL	Both	We own the freehold on Brittons Hall Farm, a residential property situated on Mashbury Road. The property is situated next to a field which is planned by NG for the situation of a pylon and a crossing point for the haul road. There are F-6/40/46/47/49/50/54. We met with representatives of the applicants agents on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure and access to the property but have not received a response. With no response, the applicant has so far failed to provide any justification for temporary right nor seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives and has failed to explain how the rights over the land will be used (Guidance para 9). In addition, the applicant has not explained why there needs to be access at night and failed to explain how our property will remain safe, secure and private. Specific concerns which have not been responded to by the applicant are:1) the boundary of the garden and the field onto which the haul road will be build is not clear. The option area shaded seems to include part of the field which does not belong to the property. 2) the purpose of acquiring the garden is not clear, even on a temporary basis. The haul road is not being built on it. There are mature trees and hedges at the end of this section backing onto the field where the haul road will be situated and onto Mashbury Road. This provides not only habitats for wildlife but also security and privacy for the property. Fisher German have said they are not clear what this land will be intended to be used for but speculated it is for visibility for traffic from the haul road crossing Mashbury Road. We have asked why they cannot consider traffic lights or moving the haul road slightly further away from the boundary of the property into the field which is already impacted as alternatives to negate the need for the acquisition and destruction on boundary trees/hedges. 3) It is not clear whether current access to the property will be impacted by proposed acquisitions. 4) Asked what provisions they will make to ensure our property is kept safe and secure if work goes ahead and if access if granted during the day or night. 5) It is not clear how overhead lines / telecom lines will be impacted and where they will occupy air space in and around the property or whether they are likely to be buried underground. 6) We rely on non-fibre wifi which is delivered via antenna on our property. Electricity pylons and overhead lines can interfere with this and we've asked for how this would be addressed. The applicant has said the plots 'may be affected' but cannot explain how, have not considered alternatives and have failed to outline how our property (and its occupants) would remain safe, secure and have privacy during any works and afterwards, where applicable. This strongly indicates the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient, and have insufficiently considered why permanent / temporary access is required at all, particularly in relation to the garden. In respect of the primary access, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control land close to the access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent and temporary rights sought, constitute a disproportionate and severe infringement of our rights under Articles 1 and 8 of the ECHR and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.	See Appendix A: AP 223 - Richard White

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BRICKKILN FARM SOLAR LIMITED	10138	Yes	Compulsory Acquisition of rights,Temporary possession	All	Both	Brickkiln Farm Solar Limited ("Brickkiln") maintains the position expressed in its consultation responses of 25 July 2024 and 17 July 2025 and in its representations submitted on 27 November 2025 (Examination Library ref. REP1-211) and 26 February 2026 (Examination Library ref. REP1-212) (together, "the Representations" and each a "Representation") in respect of the application by National Grid Electricity Transmission ("NGET") for development consent for its Norwich to Tilbury project ("the Proposed Development"). There has been no material progress in negotiations with NGET since the submission of the latest Representation despite Brickkiln's efforts to engage: the information requested from NGET in the Representations has not been provided, no heads of terms for the voluntary acquisition of land rights have been received, and NGET has not confirmed that an indemnity will be provided for any damage caused to Brickkiln Solar Farm by the Proposed Development. Executive summary NGET has not demonstrated a compelling case in the public interest for the compulsory acquisition of rights over Brickkiln Solar Farm. NGET has not made reasonable efforts to negotiate with Brickkiln, nor has it provided evidence to clarify the full extent of the impact that the Proposed Development would have on Brickkiln Solar Farm. It is reasonable to assume that the Proposed Development could cause Brickkiln to suffer significant financial losses and it is not clear whether NGET has allocated sufficient resources to fully compensate Brickkiln. NGET has also not provided any evidence to suggest that reasonable alternatives and modifications to the scheme have been considered which would avoid the need for rights over Brickkiln Solar Farm. In any event, it would be counterintuitive for improvements to low-carbon transmission infrastructure to come at the expense of an operational renewable electricity generating station. Brickkiln therefore respectfully requests the Inspector to require modifications to the Proposed Development to avoid Brickkiln Solar Farm and refuse to grant compulsory acquisition powers in relation to Brickkiln Solar Farm. Relevant legislation and guidance Section 122 of the Planning Act 2008 ("the 2008 Act") provides that a DCO may include provision authorising the compulsory acquisition of land only if the Secretary of State ("SoS") is satisfied that the land is (inter alia): (a) required for the development to which the DCO relates; or (b) required to facilitate or incidental to that development. There must also be a compelling case in the public interest for the land to be acquired compulsorily. The September 2013 'Planning Act 2008: Guidance related to procedures for compulsory acquisition' ("the Guidance") identifies a number of factors which the SoS will refer to in deciding whether to authorise the compulsory acquisition of land in the DCO. These include that: (i) the applicant should be able to demonstrate that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored and the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, necessary, and proportionate (paragraph 8 of the Guidance); (ii) the applicant must be able to demonstrate that there is a reasonable prospect of the requisite funds for acquisition becoming available (paragraph 9) (iii) the SoS must be persuaded that the purposes for which the DCO authorises compulsory acquisition of land are legitimate and sufficient to justify interfering with the human rights of those with an interest in the land affected (paragraph 10); (iv) the SoS must be satisfied that the land to be acquired is: (i) no more than is reasonably required for the purposes of the development where land is required for the development; or (ii) no more than reasonably necessary for the purpose for which it is acquired and is proportionate where the land is required to facilitate or is incidental to the development (paragraph 11); (v) the SoS must be persuaded there is compelling evidence that the public benefits that would be derived from the compulsory acquisition will outweigh the private loss that would be suffered by those whose land is to be acquired (paragraph 13). Paragraph 16 of the Guidance provides that the SoS could decide against including provisions authorising the compulsory acquisition of land in the DCO where the SoS is not persuaded all of the land is necessary or considers that the scheme should be modified. Paragraph 25 of the Guidance provides that applicants should seek to acquire land by negotiation wherever practicable. Objection to interference with land Brickkiln's land at Brickkiln Solar Farm ("the Land") is identified for compulsory acquisition on Land Plan A Sheet 2 (plots A-2/31, A-2/35, A-2/36, A-2/37, A-2/38, A-2/39, A-2/40, A-2/41, and A-2/43). According to the draft Order for the Proposed Development (document reference 3.1), rights over the Land may be needed for the construction and installation of a new overhead transmission electric line (Route RG) between the two gantries at Norwich Main Substation (Work No. 1) and the two gantries at Bramford Substation (Work No. 3), including: (a) the foundations and steelwork to construct new pylons; (b) the installation of 69 kilometres of overhead transmission electric line between Norwich Main Substation and Bramford Substation; (c) the installation of conductors, insulators and fittings; and (d) the installation of fibre optic conductors. The DCO application contemplates rights being compulsorily acquired over the Land for overhead and underground cables and temporary use of the Land ("the Rights"). It does not appear that NGET has considered all reasonable alternatives which would avoid the need for the Rights to be compulsorily acquired. It may be possible to meet the need for low-carbon transmission infrastructure without compulsorily acquiring the Rights. Brickkiln has not been provided with any site-specific assessment to justify the need for the Rights over the Land. NGET has therefore not demonstrated that it is proposing to compulsorily acquire no more land than is reasonably required or necessary for the Proposed Development. Brickkiln acknowledges that pylon RG14 is now located outside the operational boundary for Brickkiln Solar Farm to mitigate earthing interactions and safety risks. However, it is not clear that NGET has considered undergrounding or any other modifications to the scheme to avoid the need for the Rights to be acquired. It is therefore not clear that the proposed interference with the Land is for a legitimate purpose and necessary for the Proposed Development. If there is a reasonable alternative to acquiring the Rights, it is neither legitimate nor necessary to authorise the use of compulsory acquisition powers which would disrupt Brickkiln's enjoyment of its land. The interference to Brickkiln Solar Farm would also be disproportionate. The operation of Brickkiln Solar Farm, which is currently producing renewable energy and contributing to Clean Power 2030, should not be prejudiced by the compulsory acquisition of the Rights if reasonable alternatives should have been given further consideration. It is not proportionate to disrupt renewable electricity generation at an operational solar farm with a view to enabling the delivery of low-carbon transmission infrastructure if the Proposed Development could be delivered without the Rights being compulsorily acquired.	See Appendix A: AP 224 - BRICKKILN FARM SOLAR LIMITED

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						In the absence of detailed design, method statements, and outage requirements, Brickkiln has been unable to carry out a shading analysis and other evaluations to accurately assess the level of loss it would suffer as a result of the compulsory acquisition of the Rights. Brickkiln has also been unable to confirm the operational, safety, and earthing risks posed by the Proposed Development. However, it appears likely that the overhead cabling would cause shading, and the construction and operation of the cables would require the displacement and/or removal of solar panels. This would disrupt the generation of electricity at Brickkiln Solar Farm, and it is not unreasonable to assume this would cause Brickkiln to suffer significant financial losses. Such losses carry weight and must be assessed against the public benefit of the Proposed Development, but the appropriate weight to be given to these losses cannot be identified until the losses themselves have been accurately quantified. As the level of loss has not been accurately quantified at this stage, this also casts doubt on whether NGET has allocated sufficient resources to fully compensate Brickkiln for its losses. Brickkiln further objects to the grant of compulsory acquisition powers on the basis that NGET has not satisfactorily engaged in negotiations with Brickkiln to date. NGET has not yet provided information to allow Brickkiln to assess its commercial position in terms of the risks posed by the Proposed Development. This has prevented Brickkiln from being able to meaningfully negotiate with NGET. NGET has also not issued proposed heads of terms for acquisition by agreement. Brickkiln has therefore not been presented with an alternative proposal to consider instead of compulsory acquisition. Brickkiln therefore respectfully invites the Inspector to require modifications to the Proposed Development to avoid Brickkiln Solar Farm and to refuse to grant compulsory acquisition powers in relation to Brickkiln Solar Farm. Brickkiln reserves the right to maintain its objection to the Proposed Development throughout the Examination unless and until satisfactory information is provided or changes to the scheme are made. Brickkiln also reserves the right to submit further representations.	
John Stacey	5698	Yes	Compulsory Acquisition of land,Compulsory Acquisition of rights,All of the above,Temporary possession	All	Both	Reasons for objecting. No alternative route At the onset, on receiving the first documents from NG we were only given a purple swathe where NG had pre-determined the pylon route. This was not at the formative stage so did not meet the first Gunning Principle Rule. Lack of engagement. We only had direct engagement with FG, NG avoided direct engagement. The statutory guidance to which NGET need to "have regard" is here: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK. The section "What is needed for consideration of land matters?" "the strong expectation is that applicants of proposed NSIPs will act reasonably in engaging with landowners", One example of a lack of engagement is the survey licences. According to the terms of these licences land owners are allowed to receive the raw survey data within 14 days. NG consistently refused our requests for these results.This would have led to less design issues going forward. The only opportunity to speak directly was at the Consultation events. We were always told at these events that our horses were a special case and NG were aware of the problem. We were led to believe that provision would be in place for our horses wellbeing. We were also promised electric gates for our crossing points. At present these seem hollow promises. We made representation at every consultation event, any suggested route of design change was difficult to find as it was lost in the general documents available on line. At every opportunity we proposed options to allow our horses to remain in their existing paddock and field. We also highlighted the excess harm the haul road planned routeing would have in the need to remove around 100m of hedge and deep ditch. This could be minimised by a small western change to the route. NG avoided any direct engagement and therefore localised design accommodation was avoided. Both of my neighbours have indicated that they have proposed slight movement of pylons TB94 and TB100 to the West. If there had been a coordinated approach we could all have had our requests accommodated. Route Design The route should have been designed to minimise the harm. Soils NG still make the claim that the routeing and siting selection process confirms that there are no other suitable soils sites of poorer agricultural quality that can accommodate the project. They highlight that they looked at the impact on agricultural land and sought to minimise impacts on the BMV land. This cannot be true as, according to NG, soils were scoped out in the design and routeing process. Proximity to our house. The route could have been designed to allow a greater distance from our house. Crossing Horse paddock During the design process there was a lack of consideration the construction would have on horses. When pylon TB98 did get moved 80m its construction area footprint was still within the paddock and the construction noise still in a position that the horses would not tolerate, this is also the case with the haul road which runs alongside the paddock.	See Appendix A: AP 225 - John Stacey

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						This re positioning of TB98 has in fact been counterproductive as its resighting has still meant the horses will need moving and the pylon is now not near the field edge. Harm from the haul road. The haul road that runs to the west of TB97 has been designed to run diagonally across our 4m deep ditch. This has meant that around 100m of hedge will also be removed. The ditch has seven field drains running into it, these will need to be kept open and running and the ditch will need to be reinstated. UKPN works In July 2025 we found out that NG had changed the plans and decided to re-route the existing 11KV OHL through our farm yard. This will cause immense disruption. We have since offered to allow the undergrounding to be rerouted through a grass area around the house which would be considerably cheaper and avoid the considerable disruption the planned route would create. Unfortunately, this is outside the DCO draft order limit so is not possible. If there had been any engagement from NG and UKPN before May 2026, when we first found out the reason for it going through the farm yard, this could have been resolved before the DCO. Some 5 weeks later we are still awaiting further contact from either party. This is not the only issue we have with the OHL rerouting. Over by TB96 there is to be over 300m of undergrounding for the OHL, this OHL that is being removed is not even on our land. Lack of updated maps Looking at the design, firstly it has been and still is difficult to establish what is proposed, the amendments in 2025 were not available on NG's interactive map until the DCO was made. Suds The suds are not all positioned to allow natural drainage from the haul roads. Construction Compound. The plan is that there will be a construction compound on our land alongside the B1018, the bellmouth into the compound will be problematic as the field is around a metre higher than the road and the compound has been placed where the road has a gradual curve. I have been told that NG will not lower the field level, but as a landowner we need to see a design as eventually we will need to bring the area back into crop production. Permanent Access These tend to run within the fields and do not make use of the headlands. This access needs to be agreed mutually and not just imposed upon us from the NG desktop design. Draft Order Limit The width of the draft order is excessive. We are uncertain what is planned within this area. Will we be able to farm the land up to the start of construction and what will the area of land that will not be available to be cropped be and how long for? Inadequate Consideration of Alternatives. Several alternatives have not been properly considered. TS Conductors These would mean potential for a reduced number of pylons. Offshore. After a lot of pressure NG made a token attempt at looking at an offshore option. They did not look at an offshore hub but just a direct route, this was for three 2MW DC Cables. In fact, as it was DC, two cables would have been sufficient as found in the Eastern Green Link 3 & 4 Strategic Optioneering Report 2024 HVDC Undergrounding. This could be considerably less harmful and would only need 4MW as DC is more efficient. Project costs. The 10% contingency is considerably low and would cover the injurious compensation which seems impossible to have benchmarked when the level of design is at such a preliminary stage. Farm safety. Clearance of farm machinery According to NG, line safety clearance for farm machinery is expected to be implemented by third parties whenever they are near overhead lines. NG state that agricultural vehicles, such as combine harvesters will be safe to pass underneath. Across our farm the indicated line will be below 10m at its lowest point. According to the Energy Network Association Passing safety clearance is for harvesting is 4.3m for 400 Kv, at present the largest New Holland Combine at its highest point is 6.56m. This will create unacceptable safety concerns for farmers. Payment rates NG are using their Land Rights Strategy for payments for pylons, these payments are too low and NG are relying on injurious compensation. EirGrid are offering an upfront payment of €43,000 for pylons and €140 per metre for power lines. In addition, there is a minimum payment of €8,000, and landowners may seek further compensation within six years. Current negotiations We met FG in February and discussed UKPN Undergrounding, Siting of Pylons/Haul roads, Horse Paddocks, Construction Impacts, Footpath Diversions, Trees, Haul Roads and Badger Setts. We then had a meeting with NG and FG on 12TH May. We had expected at this meeting to receive answers to the points we raised at the February meeting but NG couldn't tell us anything. Do NG have plans or are they just not willing to share them with us? We are uncertain on their plans for our horses, as if the plan goes ahead they will need permanently relocating well ahead of any works, which will be a considerable cost that we cannot afford and cannot be burdened with. Conclusion We are not going accept a voluntary agreement as NG, over the four years, have not sufficiently engaged with us and have withheld information. They have not taken on board our suggestions even though we indicated that we would not voluntarily agree if they did not resolve the issue with the horses and move the pylon away from their paddock. The design at its infancy should have considered a higher degree of embedded mitigation for noise even it had been further from our residence.	

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Richard Long Group Limited	10184	Yes	All of the above	All	National Grid	The objections to the interference with land rights are summarized as follows •The Applicant's failure to consider alternatives for their project, less intrusive options exist •The land is not necessary for the scheme, alternative designs or routes could avoid acquisition of these rights. •The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods, in this case involving a solar farm •Pre-application-there has been insufficient detailed preparatory work by the Applicant prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward •Inadequate engagement or negotiation-we have been trying to address with the Applicant the issue of the proposed power lines crossing the solar site for nearly 3 years with little feedback from the Applicant •Lack of compelling case in the public interest-the Applicant has not demonstrated a sufficiently strong justification for the project •Compensation issues-we have concerns about whether affected parties will receive fair and timely compensation •Heads of Terms-despite negotiations with the Applicant no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement from the Applicant	See Appendix A: AP 226 - Richard Long Group Limited
Linda Fisher	1169	Yes	All of the above	D-6/3	Both	am writing to you because my land is directly affected by the proposed Norwich to Tilbury Grid Upgrade Scheme, with our comments for the statutory consultation in relation to Norwich to Tilbury Grid Upgrade. Property description My property comprises a detached cottage with gardens and additional, connected, land containing a reservoir. The property is located on Fossetts Lane in the village of Fordham in Essex. The land and reservoir, serve a very important role in my family life, providing a safe recreation and amenity area for family and friends. My property is not a commercial horticultural or agricultural property, and therefore differs from the majority of properties directly affected by the scheme, which are predominantly, traditional agricultural use. A Nationally Significant Infrastructure Project (NSIP) has significant impact on all types of property that are directly affected by it, but often greater impact is felt on residential properties, such as mine. In most cases, residential occupiers are unfamiliar with any form of compulsory purchase and the direct impact this can have. As a result, it is even more important that detailed information is provided to them to enable them to understand the impacts, and to attempt to allay natural fears and heightened anxiety. Land Plans The land plans showing the scheme requirements provided to me in Fisher Germans letter date 16th June 2025 are, for a lay-person unfamiliar with such infrastructure schemes, very difficult to interpret. Two plans were provided with the letter. One shows the scheme requirements related to one HM Land Registry Title Number at small scale and the other at a larger scale. From the Legend accompanying the plans it is not possible to ascertain with any certainty what the areas are required for. The plans show a portion of the southeast bank of the reservoir shaded green. The Legend states that this is "Zone for permanent assets (NGET)". No further detail is provided. In an attempt to gain clarity, the Norwich to Tilbury interactive map accessed at https://norwichtotilburymap.nationalgrid.com/ was referred to. This shows similar to the plans issued, and with no further detail regarding the works. As may be anticipated, the thought that part of my land is to be acquired by National Grid for any purpose is incredibly unnerving and has created a massive amount of stress and anxiety. The additional stress from the lack of information on the proposed use of the land has only served to make matters even worse.	See Appendix A: AP 227 - Linda Fisher
						Landowner Engagement Over the past two years I, together with my land agents have engaged with your land agents Fisher German, and at every consultation stage useful feedback has been provided on National Grids proposed scheme. Additional detailed information and clarity has been requested from Fisher German / National Grid regarding the potential impacts of the scheme on my property. At each meeting, the said requested additional information has not been available for Fisher German to share with us and as a result, despite the two years of engagement, i still have very little significant specific information on how the scheme will actually affect my property. Although engagement meetings have been provided to me, as stated, the distinct lack of significant content and details provided at those meetings has not only NOT helped allay my fears, but has actually increased my concerns. I am retired and enjoy the amenity that the reservoir provides to my property and the recreational opportunities it provides to my wider family. Despite having entered into early engagement meetings, the position that I find myself in now with regards the scheme, through no fault of my own, is taking a considerable toll on my life and my wider family's life. The complete lack of significant information being provided from National Grid, has put me in an intolerable position.	
Chris Smith	14516	Yes	All of the above	All, but C-15/24, C-17/23, C-17/39, C-17/107 and C-17/112 in particular	Both	The interference with our land in Little Bromley is only being considered because of the plan to build a substation or connecting point at Ardleigh. I do not believe that a proper, evidence based case has been made for the alleged need to construct a sub station at Ardleigh. It is not needed for the Norwich to Tilbury project itself, and there are better ways to connect Five Estuaries and North Falls to the grid. The requirements of section 122 (2) are not therefore satisfied because the interference with our rights is not required for the Norwich to Tilbury project and is not incidental to it. In particular the Norwich to Tilbury project could and should be completed without coming anywhere near Ardleigh or Little Bromley.	See Appendix A: AP 228 - Chris Smith

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Natalie Smith	14087	Yes	All of the above	All, but C-15/24, C-17/23, C-17/39, C-17/107 and C-17/112 in particular	Both	The interference with our land in Little Bromley is only being considered because of the plan to build a substation or connecting point at Ardleigh. I do not believe that a proper, evidence based case has been made for the alleged need to construct a sub station at Ardleigh. It is not needed for the Norwich to Tilbury project itself, and there are better ways to connect Five Estuaries and North Falls to the grid. The requirements of section 122 (2) are not therefore satisfied because the interference with our rights is not required for the Norwich to Tilbury project and is not incidental to it. In particular the Norwich to Tilbury project could and should be completed without coming anywhere near Ardleigh or Little Bromley.	See Appendix A: AP 229 - Natalie Smith
John Fisher	6961	Yes	All of the above	D-6/3	Both	We have been to the various public exhibitions to view the plans but pylons were the only option on the table, no consideration given to the alternatives, eg underground or offshore. Surely all options should have been available so the public could have a balanced view. NG have not taken into account the consequences of their actions will alter the character and visually pollute a wide corridor of East Anglian countryside either side of the route. The cables will be a major hazard to migrating birds, the footings will eat up many acres of productive farmland. We are privileged to live in a cottage in FORDHAM that has enjoyed unblemished views over the beautiful Colne Valley for over 500 years. The woodland trust recently planted 1000's of trees around the village and visitors come from all around the country to enjoy them but if the preferred route goes ahead not only will our cottage will be SURROUNDED by pylons, the trees will be a casualty, who would like to picnic under a pylon! Thankfully there is a lot of opposition against these plans, with the alternatives of underground and the preferred option of offshore pipelines suggested. National Grid should consider undergrounding between TB42 and TB50 in light of the special character of the Fordham Valley and the disproportionate impact pylons there would bring. 6) There is significant archaeology in the area between TB46 and TB52. Damage to these sites is unacceptable and careful routing will be required to avoid entirely, regardless of whether pylons or underground cable are employed. The woodlands at Fiddlers Farm / Fiddlers Woods are ancient and Fiddlers Farm is a Listed Building, ruling out a more easterly route. Thank you for considering my comments.	See Appendix A: AP 230 - John Fisher
Robert Gray Farming Contractors Ltd	10555	Yes	All of the above	All	National Grid	Our objections are as follows: •National Grids failure to consider alternatives for their project, there are less intrusive options •The land is not necessary for the scheme, alternative routes could avoid acquisition of these rights. •The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. •Pre-application-there has been insufficient detailed preparatory work by National Grid prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward •Inadequate engagement or negotiation-we have been trying to address with National Grid the issue of the proposed power lines crossing our land with little feedback •Lack of compelling case in the public interest-National Grid has not demonstrated a sufficiently strong justification for the project •Compensation issues-we have concerns about whether affected parties will receive a fair compensation •Heads of Terms-despite negotiations with the National Grid no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement	See Appendix A: AP 231 - Robert Gray Farming Contractors Ltd
ARU Writtle (Writtle University College / Anglia Ruskin University)	7116 28443	Yes	All of the above	F-8/9, F-8/15, F-8/16, F-8/17, F-8/19, F-8/20, F-8/21, F-8/23, F-8/24, F-8/25, F-8/26, F-8/27, F-8/29, F-8/30, F-8/32, F-8/33, F-8/36, F-8/37, F-8/42, & F-8/47	Both	ARU Writtle (F1201D065, NTOT-AFP2247) is described in the Lands Right Tracker and the Schedule of Affected Persons as "Writtle University College" (PIL 7116) and "Anglia Ruskin University Higher Education Corporation" (PIL 28443). ARU Writtle's objection centres on the legal requirement that compulsory acquisition powers in a Development Consent Order (DCO) must be necessary, justified, and supported by a compelling public interest case, and that National Grid Electricity Transmission (NGET) has failed to meet those standards in relation to ARU Writtle's land and most notably Plot 8/42. The objection relies on the statutory tests in particularly the emphasis on necessity, proportionality, and consideration of alternatives. NGET have failed to satisfy Section 122(2) and 123 PA 2008 through lack of necessity or requirement as the purpose of CA Plot 8/42 can be achieved through powers already included in the draft DCO, TRO's and road closures. Failure in relation to Section 122(3) that there is no compelling case in the public interest as the scheme can proceed without interfering with ARU Writtle's land rights and the acquisition is therefore disproportionate and unnecessary. The Application creates a logical contradiction; if traffic is excluded, scaffolding access becomes unnecessary and if alternative access exists, additional rights are duplicative. The statutory tests cannot be satisfied. In relation to the Government Guidance ARU Writtle argues that the guidance requires a clear justification that land is needed for the scheme, but that the presence of alternative access routes and powers shows no genuine need. There is a lack of proper consideration of alternatives. The guidance stresses that interference with private rights must be no more than necessary but acquiring Plot 8/42 exceeds what is required, especially where the objective can be achieved via less intrusive means and the impact of access and use of Plot 8/42 is so impactful on ARU Writtle. Severe disruption to a nationally significant education and research facility The proposed overhead line and construction access directly affect ARU Writtle's Equine Unit, which underpins teaching, research, industry collaboration and student placements across agriculture, animal sciences and equine studies. Unacceptable health and safety risks Construction traffic and works would pass through the Equine Centre, close to stables, teaching rooms, parking areas and riding arenas, creating serious risks to students (including under 18s), staff and horses, and obstructing emergency access and evacuation routes. Incompatibility with equine welfare and animal safety Horses are highly sensitive to noise, machinery, vibration and EMFs. Overhead lines above grazing paddocks would render fields unusable, increase stress and health risks, force prolonged stabling and compromise animal welfare. Loss of essential grazing and long term operational constraints Construction and reinstatement would lead to extended loss of safe equine grazing, with paddocks taking 12+ months to become suitable again, causing enduring disruption beyond the construction phase.	See Appendix A: AP 232 - ARU Writtle (Writtle University College / Anglia Ruskin University)

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						Irreplaceable educational harm Practical, hands on learning is fundamental to 17 FE, undergraduate and postgraduate programmes. Current proposals would prevent safe delivery of assessments, clinical exams and required contact hours, risking non compliance with regulatory and accreditation requirements. Significant financial and reputational damage Expected losses include reduced tuition income, additional stabling and veterinary costs, disruption to loan horse schemes, cancellation of external clinics and competitions, and long term reputational harm affecting recruitment, retention and partnerships. Increased traffic and access pressures Construction traffic would intensify pressures on narrow single-track routes (including Cow Watering Lane), exacerbating congestion, safety risks and disruption at peak times. Environmental and ecological impacts The proposed acquisition would result in avoidable disturbance to undeveloped paddock land that is not being mitigated. It will introduce additional ground disturbance, soil compaction, loss of vegetation, fragmentation of paddock habitats and dangers to horses and humans introducing cumulative long term environmental and ecological impacts and effects. Overall The compulsory acquisition is unnecessary and is not the least intrusive option. The Secretary of State cannot lawfully include Plot 8/42 in the DCO because, section 122(2) is not satisfied (no necessity), and section 122(3) is not satisfied (no compelling case). Consent should only be granted for development that is "required". Plot 8/42 is not "required", so it must be excluded. This is set out in full in ARU Writtle's written submissions REP1-200, REP3-117, REP4-348.	
Robert Gray	14200	Yes	All of the above	All	Both	Our Objections are as follows: •National Grids failure to consider alternatives for their project, there are less intrusive options •The land is not necessary for the scheme, alternative routes could avoid acquisition of these rights. •The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. •Pre-application-there has been insufficient detailed preparatory work by National Grid prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward •Inadequate engagement or negotiation-we have been trying to address with National Grid the issue of the proposed power lines crossing our land with little feedback •Lack of compelling case in the public interest-National Grid has not demonstrated a sufficiently strong justification for the project •Compensation issues-we have concerns about whether affected parties will receive a fair compensation •Heads of Terms-despite negotiations with the National Grid no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement	See Appendix A: AP 233 - Robert Gray
Deborah Smith / Andrew Donald Smith	3398	Yes	All of the above	All	Both	I do not give any permission relating to my property relating to this scheme. The scheme is environmentally detrimental, personally financially detrimental. This is my land. I am already disadvantaged by this scheme so I am totally against it in every way. I do not have any permissions.	See Appendix A: AP 234 - Deborah Smith / Andrew Donald Smith
Richard Long Limited	10556	Yes	Compulsory Acquisition of rights, Temporary possession	All	National Grid	The objections to the interference with land rights are summarized as follows •The Applicant's failure to consider alternatives for their project, less intrusive options exist •The land is not necessary for the scheme, alternative designs or routes could avoid acquisition of these rights. •The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. •Pre-application-there has been insufficient detailed preparatory work by the Applicant prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward •Inadequate engagement or negotiation-we have been trying to address with the Applicant the issue of the proposed power lines crossing the land with little feedback from the Applicant •Lack of compelling case in the public interest-the Applicant has not demonstrated a sufficiently strong justification for the project •Compensation issues-we have concerns about whether affected parties will receive fair and timely compensation •Heads of Terms-despite negotiations with the Applicant no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement from the Applicant	See Appendix A: AP 235 - Richard Long Limited

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
Joe Hearnden, BTF Partnership on behalf of the Cole Family	The Cole Family (multiple references, see RR-3629 for list of Aps)	Yes	All of the above	All	Both	The Applicant has failed to demonstrate that the compulsory acquisition of the Affected Person's specific land or rights is strictly necessary to deliver the scheme. The inclusion of the Affected Person's property appears to be driven by a desire for flexibility or contingency rather than a clearly evidenced requirement. The Application lacks justification as to why the Affected Person's land is essential, nor any evidence that the scheme could not proceed with a reduced land take or alternative configuration. The extent of the rights sought is disproportionate to the needs of the Scheme. The Applicant appears to be seeking permanent rights or outright acquisition in circumstances where temporary access or limited rights would be sufficient. The proposals do not demonstrate that impacts on the Affected Person's property have been minimised and instead impose excessive interference with the Affected Person's use and enjoyment of the land. This includes long-term constraints on use, potential loss of value, and disruption to access or operations. Such interference fails to strike a fair balance between private rights and public benefit. There has been an inadequate consideration of reasonable alternatives. The Applicant has not meaningfully explored different route alignments, layouts, or design refinements that could avoid or reduce impacts on the Affected Person's property. Without a transparent and reasoned assessment of alternatives, it cannot be concluded that the current proposals represent the least intrusive solution or the which is most effective at delivering on the public need. This omission significantly weakens the justification for a Development Consent Order. There are concerns regarding the deliverability of the scheme. Uncertainty remains where Objectors often point to a lack of secured funding, necessary consents, and the realism of the proposed programme. Where delivery is not clearly secured, it is inappropriate to authorise compulsory acquisition powers that may result in land being taken or rights being restricted without the Scheme proceeding as anticipated. These uncertainties undermine the claimed public interest case. The Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement. Engagement to date has been limited and has not amounted to meaningful negotiation. The Applicant has proposed Heads of Terms for the rights and interests being sought, but are unable or unwilling to alter or amend the terms sufficiently for parties to resolve disputes or reach points of common ground. In particular, there has been insufficient effort to reduce the extent of acquisition or to explore less intrusive options through discussion. The Affected Person does not believe that the Applicant has reached the required threshold to justify the use of compulsory acquisition powers as a measure of last resort. There are concerns regarding compliance with procedural and legal requirements. The justification for the inclusion of the Affected Person's land, and for the specific rights sought, has not been clearly or adequately articulated. To the extent that the Order seeks powers beyond what is necessary or lacks sufficient precision, it risks exceeding statutory limits. The panel of Examining Inspectors must be satisfied that all legal requirements are fully and properly met, which does not appear to be the case. The compensation framework concerning the full extent of impacts, including injurious affection, disturbance, and long-term restrictions on the use of the Affected Person's property is inadequate or fails to strike a fair balance under Human Rights legislation. While compensation cannot justify unnecessary acquisition, the framework must still ensure affected parties are treated fairly, which has not been convincingly demonstrated.	See Appendix A: AP 236 - Joe Hearnden, BTF Partnership on behalf of the Cole Family
Joe Hearnden, BTF Partnership on behalf of the Brice Family	The Brice Family (multiple references, see RR-3626 for list of Aps)	Yes	All of the above	all	Both	The Applicant has failed to demonstrate that the compulsory acquisition of the Affected Person's specific land or rights is strictly necessary to deliver the scheme. The inclusion of the Affected Person's property appears to be driven by a desire for flexibility or contingency rather than a clearly evidenced requirement. The Application lacks justification as to why the Affected Person's land is essential, nor any evidence that the scheme could not proceed with a reduced land take or alternative configuration. The extent of the rights sought is disproportionate to the needs of the Scheme. The Applicant appears to be seeking permanent rights or outright acquisition in circumstances where temporary access or limited rights would be sufficient. The proposals do not demonstrate that impacts on the Affected Person's property have been minimised and instead impose excessive interference with the Affected Person's use and enjoyment of the land. This includes long-term constraints on use, potential loss of value, and disruption to access or operations. Such interference fails to strike a fair balance between private rights and public benefit. There has been an inadequate consideration of reasonable alternatives. The Applicant has not meaningfully explored different route alignments, layouts, or design refinements that could avoid or reduce impacts on the Affected Person's property. Without a transparent and reasoned assessment of alternatives, it cannot be concluded that the current proposals represent the least intrusive solution or the which is most effective at delivering on the public need. This omission significantly weakens the justification for a Development Consent Order. There are concerns regarding the deliverability of the scheme. Uncertainty remains where Objectors often point to a lack of secured funding, necessary consents, and the realism of the proposed programme. Where delivery is not clearly secured, it is inappropriate to authorise compulsory acquisition powers that may result in land being taken or rights being restricted without the Scheme proceeding as anticipated. These uncertainties undermine the claimed public interest case. The Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement. Engagement to date has been limited and has not amounted to meaningful negotiation. The Applicant has proposed Heads of Terms for the rights and interests being sought, but are unable or unwilling to alter or amend the terms sufficiently for parties to resolve disputes or reach points of common ground. In particular, there has been insufficient effort to reduce the extent of acquisition or to explore less intrusive options through discussion. The Affected Person does not believe that the Applicant has reached the required threshold to justify the use of compulsory acquisition powers as a measure of last resort. There are concerns regarding compliance with procedural and legal requirements. The justification for the inclusion of the Affected Person's land, and for the specific rights sought, has not been clearly or adequately articulated. To the extent that the Order seeks powers beyond what is necessary or lacks sufficient precision, it risks exceeding statutory limits. The panel of Examining Inspectors must be satisfied that all legal requirements are fully and properly met, which does not appear to be the case. The compensation framework concerning the full extent of impacts, including injurious affection, disturbance, and long-term restrictions on the use of the Affected Person's property is inadequate or fails to strike a fair balance under Human Rights legislation. While compensation cannot justify unnecessary acquisition, the framework must still ensure affected parties are treated fairly, which has not been convincingly demonstrated.	See Appendix A: AP 237 - Joe Hearnden, BTF Partnership on behalf of the Brice Family

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
David William Salmon	5741	Yes	All of the above	All	Both	We object to the NG Norwich to Tilbury pylon route and especially its lack of engagement with ourselves over the impacts to our business and land holding during the so called 'consultation and engagement meetings'. In particular we object to the following points:- •Lack of meaningful engagement and information sharing, in particular information regarding our irrigation reservoir with active fishing club in Ardleigh (Drawing AENC-TQST-LAN-DWG-0002 parcel ref 17/39) Initially ignoring our feedback regarding our angling club and then not answering questions about the future of angling on the lake, which we now understand will be prohibited completely. •Lack of meaningful engagement regarding the permanent private access road- we have had to feedback on designs at meetings where information is so lacking that our response has been limited. Even with the 2 rounds of variations the engagement was very one sided resulting in each variation being more detrimental to our business than the previous iteration. We provided multiple rounds of feedback and if only the designers consulted with us in a 2 way dialogue a design which sterilises less of our land and has a smaller impact could have been found. As it stands we are still un-clear of how we will access our field (15/52 on drawing AENC-TQST-LAN-DWG-0002) as our only access route has been severed by the road and the latest route sterilises our land in a long 30m wide slither between road and our boundary. •Lack of information regarding the use of the permanent private access road and the shared temporary wind farm substation construction road. When will they be used and for what? There is no meaningful information on how NG would 'share' the wind farm road, We cannot negotiate or provide feedback if there is no information. They have included all the option routes on the wind farm road and cannot provide clarity of what they intend to do. •Cumulative impact of wind farms and NG on our farmland and residential house at Hall Farm is unacceptable. With 2 haul roads and multiple companies/operators involved the resulting un-certainty and direct impact of when/if projects go ahead and the duration of the works will have a significant impact on the farm business, environment and enjoyment of our house(noise/dust/view etc) •Insufficient negotiation on the HOT's on all general points and especially where the substation haul roads are involved, as information is not available. In conclusion we feel the lack of negotiation and information being shared is not acceptable and require progress on all of the above points before we would be in agreement with the CA or TP of land rights by NG.	See Appendix A: AP 238 - David William Salmon
Robert Moore	4235	Yes	All of the above	All	Both	I object to the proposed project for the following reasons: 1)Failure to properly consider alternatives to pylons The applicant has failed to adequately consider alternatives to the use of pylons for this project. Less intrusive options appear to exist, but these have not been properly assessed, explained, or justified. 2)Failure to consider less harmful alternatives The proposal does not demonstrate that the least damaging or least intrusive option has been selected. The applicant has not shown that alternative routes, technologies, mitigation measures, or methods of delivery have been fully explored in order to reduce the impact on affected landowners, businesses, homes, and livelihoods. 3)Disproportionate private loss and human rights impact The proposed project would cause very significant private loss and would have a serious impact on the rights and livelihoods of affected landowners and businesses. In our case, the proposed power lines would cross our farm and would cause substantial harm to our business, including the destruction of a wedding venue, which is the small farm's main source of income. This impact is severe, personal, and disproportionate. The harm to land, businesses, income, and way of life outweighs any public benefit that the applicant claims would arise from the project. 4)Lack of a compelling case in the public interest The applicant has failed to demonstrate a compelling case in the public interest for this project in its proposed form. There has been insufficient justification for why the project must proceed using pylons, why this route has been selected, and why less intrusive alternatives have not been pursued. 5)Insufficient pre-application work and inadequate consultation Prior to submitting the DCO application, the applicant failed to carry out sufficient detailed preparatory work, particularly in relation to consultation and engagement with affected landowners. 6)We have been trying to address the issue of the proposed power lines crossing our farm with the applicant for three years. Despite this, we have received limited feedback and there has been no meaningful progress towards resolving our concerns. This demonstrates inadequate engagement, poor communication, and a failure to properly consult with those most directly affected. 7)Inadequate engagement and negotiation The applicant has not engaged with us in a constructive or meaningful way. Given the scale of the impact on our farm and business, we would have expected detailed discussions, proper negotiation, and genuine attempts to reduce or avoid the harm caused. This has not happened. I imagine many other businesses / farms have similar -----	See Appendix A: AP 239 - Robert Moore

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						8)Compensation concerns We have serious concerns about whether affected parties will receive fair, adequate, and timely compensation. The damage to our business and livelihood would be substantial, and to date there has been no communication from the applicant about how losses will be assessed, how compensation will be calculated, and when compensation would be paid. 9)No heads of terms or voluntary agreement No heads of terms or voluntary agreement has been signed. This is due to the lack of meaningful engagement and negotiation by the applicant. The absence of agreed terms further demonstrates that the applicant has not properly addressed the impact of the project on our land and business. For these reasons, I object to the application. I ask that the Examining Authority gives significant weight to the severe impact on our farm, business, livelihood, and property rights, and requires the applicant to properly consider less intrusive alternatives before any consent is granted.	
Parkers Of Leicester Limited	10218		All of the above	All	Both	1. Introduction 1.1. These representations are made on behalf of Parkers of Leicester Limited ("POL") and Parker Strategic Land Limited ("PSL") (together, "our clients") in relation to National Grid Electricity Transmission plc ("National Grid")'s application for a Development Consent Order for the Norwich to Tilbury Project (the "Project"). 1.2. POL owns land within the DCO redline boundary ("POL's Land"), identified under the following Land Plot numbers within the DCO Land Plans – Section E [APP-013]:E-2/116, E-2/117, E-2/119, E-2/120, E-2/121, E-2/123, E-2/124, E-2/125, E-2/126,E-2/127, E-2/128, E-3/1, E-3/2, E-3/3, E-3/4, E-3/5, E-3/8, E-3/9, E-3/10, E-3/11,E-3/12, E-3/15, E-3/23, E-3/27 and E-3/29. 1.3. POL's Land forms part of a wider site of approximately 553 hectares ("the Development Site") being promoted by PSL for residential-led mixed use development comprising up to 6,000 new homes and 40ha of employment land. The Development Site was recently identified by Braintree District Council as a preferred site in the Regulation 18 consultation on the emerging Braintree Local Plan. Our clients confirm that their objection to the interference with their land rights is maintained in its entirety. 2. Summary of Objections 2.1. Our clients' objections were set out in full in their Relevant Representations. They are summarised below. Inadequate Justification for the Extent of the Order Limits and Compulsory Acquisition 2.2. The DCO application allows for Limits of Deviation ("LoD") representing the maximum locational flexibility for permanent infrastructure. On most land plots the LoD are of a standard width. However, on Plots 3/32, 3/31, 3/28, 3/23, and 3/29, the LoD and Order Limits are significantly wider than elsewhere. No adequate justification has been provided for why the Order Limits on POL's Land must be so wide or of such an unusual shape. Seeking powers with significant flexibility, without demonstrating why such flexibility is essential, is contrary to the fundamental principle that compulsory acquisition powers should only be sought over land demonstrably necessary for delivery of the Project. 2.3. These matters are directly relevant to Section 122 of the Planning Act 2008, which requires that compulsory acquisition of land is necessary for the purposes of the authorised development. In the absence of plot-specific justification, the applicant cannot demonstrate that the compulsory acquisition of such extensive rights over POL's Land is necessary. This is further at odds with the Department for Communities and Local Government Guidance, Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) ("the Guidance"), which requires acquiring authorities to demonstrate that land take is the minimum required. 2.4. National Grid has stated it is satisfied that all land interests identified for compulsory acquisition and temporary possession are required. However, the Statement of Reasons provides only generic, high-level justification rather than plot-specific analysis. There is no detailed explanation of why each individual plot is necessary, whether less intrusive alternatives have been considered, or why the extent of land take is proportionate. This falls short of the Guidance. Failure to Demonstrate Compulsory Acquisition as a Last Resort 2.5. The Statement of Reasons fails to demonstrate that compulsory powers are genuinely a last resort as required by the Guidance. National Grid claims its preference is to secure land rights on a voluntary basis, yet the Statement of Reasons provides no evidence of meaningful negotiations with our clients, no detail on offers made or rejected, and no explanation of why voluntary agreement has not been reached. The Guidance requires acquiring authorities to demonstrate reasonable steps to acquire by agreement. The minimal engagement with our clients demonstrates that the applicant has not treated compulsory acquisition as a last resort.	See Appendix A: AP 240 - Parkers Of Leicester Limited

Your full name	Person with Interest in Land (PIL) Reference ID (see Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051)	Do you object to the Compulsory Acquisition (CA) or Temporary Possession (TP) of your land or rights over your land or any proposed interference with your existing land rights?	Do you object to CA, TP or both (select all that apply)?	On which plots listed in the Book of Reference (BoR) do you object to the interference of land rights? List each plot (e.g. A-1/1) or if applicable, type 'All'	Do you object to the interference of land rights by National Grid and/ or UK Power Networks?	Please summarise (in no more than 1500 words) the reason(s) for your objection to the interference of your land or rights, with reference to the relevant articles of the Planning Act 2008 (in particular)	Applicants Response
						3. Continuing Inadequacy of Engagement 3.1. The applicant's engagement with our clients has been, and remains, wholly inadequate. Despite the Project having been in planning for a number of years, the applicant has made minimal effort to engage with POL regarding the impact on POL's Land and the Development Site. Our clients have been seeking to engage with National Grid since July 2024 on the potential conflict between the Project and the Development Site. 3.2. Since submitting their Relevant Representations, our clients have continued to seek constructive engagement with National Grid on pylon alignment, mitigation and the interface between the Project and the Development Site. No meaningful progress has been made. National Grid has not engaged substantively with our clients' specific concerns, and no Statement of Common Ground has been entered into. This is in stark contrast to the approach taken towards other affected parties – as demonstrated by the detailed Statement of Common Ground with Blackwater Aggregates (Bradwell Quarry). Our clients are entitled to equivalent engagement and have received none. 3.3. The absence of meaningful engagement further demonstrates that the test under the Guidance – that compulsory acquisition must be a genuine last resort – has not been met. 4. National Grid's Proposed Southward Realignment of the Overhead Line and its Prejudicial Impact on the Development Site 4.1. Our clients wish to draw the Examining Authority's attention to a further development that has arisen during the course of the examination, which materially worsens the position for our clients and reinforces their objection. 4.2. As confirmed in National Grid's Draft Statement of Common Ground with Blackwater Aggregates (Bradwell Quarry) (document reference 8.3.27, Revision B, Deadline 4), the applicant has committed to an alternative route scenario that moves pylons TB085 and TB086 further to the south, with TB084 positioned closer to the Order Limits. The applicant has stated that it has committed to this alternative option and will now progress with it as the preferred scenario. 4.3. This realignment has been made to accommodate the interests of Blackwater Aggregates in relation to the Bradwell Quarry Monks Farm site at Kelvedon, which Blackwater Aggregates seeks to develop for the extraction of sand and gravel. The mineral rights at Monks Farm are owned by Blackwater Aggregates, and the Monks Farm extension is understood to be area A8 (Essex County Council mineral planning department reference site A47). 4.4. The alternative scenario adjusts the overhead line between TB084 and TB087, moving pylons further south within the Order Limits, with the stated purpose of reducing mineral sterilisation within the quarry area. 4.5. Our clients object strongly to this approach for the following reasons. 4.6. First, the southward movement of the overhead line centre line within the Order Limits means that the pylons will have a greater impact on POL's Land and the Development Site, which lies to the south. This directly increases the sterilisation of the Development Site and worsens the interference with our clients' land rights compared to the position as originally proposed. 4.7. Second, the realignment is being made principally to protect the interests of Gent Fairhead & Co Limited and Blackwater Aggregates in respect of emerging mineral interests at Monks Farm, Kelvedon. However, the extraction of sand and gravel at Monks Farm is not yet identified in the Minerals Local Plan (being only an emerging allocation at present) and subject to mineral planning consent being granted. 4.8. This means that the mineral extraction interest at Monks Farm has no formal planning status. Yet, the Development Site was voted by Braintree District Council's Local Plan Sub-Committee on 6 October 2025 to be included in the Regulation 18 consultation on the emerging Braintree Local Plan, which identifies it as a potential strategic site for future growth. ~~Our clients consider this approach to be a double standard that includes the Development Site.~~ 4.9. Third, and critically, the emerging housing allocation on the Development Site should in fact be given greater weight than the mineral interests at Monks Farm, not less. The Development Site represents a critical component of the housing land supply in the emerging Braintree Local Plan. It will be essential to meeting identified local housing need during the plan period. The delivery of up to 5,000 homes on a highly sustainable site adjacent to the railway line and Kelvedon station addresses a national imperative to deliver new housing. National planning policy gives significant weight to housing delivery. 4.10. By contrast, the Monks Farm mineral interests, whilst of local importance, carries no greater planning status than the Development Site. National Grid's decision to prefer the mineral interest over the housing allocation interest, in a manner that increases the interference with our clients' land rights, is wrong in principle and unjustified on the evidence. It represents the same double standard that our clients have previously objected to: the applicant applies a double standard by providing detailed analysis and mitigation for some emerging allocations whilst either ignoring or, in this case, actively prejudicing others. 4.11. Our clients therefore call upon the Examining Authority to scrutinise National Grid's approach to this realignment as part of its consideration of whether there is a compelling case in the public interest for the interference with our clients' land rights under Section 122 of the Planning Act 2008, and to give proper and proportionate weight to the significance of the Development Site as an emerging allocation for a major strategic housing development.	
Arqiva Limited	10301					I write in response to your letter of 1st June requesting that Arqiva Limited complete the electronic form provided before deadline 5a and ongoing discussions between Arqvia Limited and representatives of the developer in respect of the matters raised in my objection letter of 11th May 2026 (REP4-347). I wish to update the Planning Inspectorate that Arqiva's Technical Safeguarding Team has now discussed their concerns with representatives from the Norwich to Tilbury Project. Arqiva are expecting the developer to consider how the project impacts their network and suggest potential ways in which impacts can be mitigated. Subject to the conclusion of this discussion, it is the intention that a Statement of Common Ground is provided to the Examination before Deadline 7 (21st July). I would be grateful if you could pass this update to the relevant examining Planning Inspector and I anticipate providing a further update in the coming days.	See Appendix A: AP 241 - Arqiva Limited
Susan Wardale	8927	Yes	Compulsory Acquisition of land, Compulsory Acquisition of rights	A-4/67	Both	Whole scheme should be underground Alternatives have not been considered Less intrusive options exist Viability of the project There has been inadequate engagement or negotiation	See Appendix A: AP 242 - Susan Wardale

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62.	AP 62 - Geoffrey Norman William Stevens	A315
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79.	AP 79 - Susanna Nunn	A419
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87.	AP 87 - Nicola Moore	A473

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88.	AP 88 - Christopher John Thorogood	A482
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89.	AP 89 - Gillian Mather	A488
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90.	AP 90 - Stuart Philpot (SJR Farming Ltd)	A495
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91.	AP 91 - Richard Turner	A498
91.1	Person with Interest in Land (PIL) Reference ID: 14378	A498
92.	AP 92 - Tamasyn Holland	A504
92.1	Person with Interest in Land (PIL) Reference ID: 28603, 20989	A504
93.	AP 93 - Rachel Bryan	A510
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94.	AP 94 - Andrew David Upson	A516
94.1	Person with Interest in Land (PIL) Reference ID: 4711	A516
95.	AP 95 - Janette Upson	A518
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98.	AP 98 - Mr Toby Reeves	A531

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101.1	Person with Interest in Land (PIL) Reference ID: 5622, 7360	A555
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103.	AP 103 - John Mather	A573
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104.	AP 104 - Shelly Eliza Cockrell	A581
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211.	AP 211 - Gillian Ann Whittle	A1269
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212.	AP 212 - Nicola Jane Underwood	A1274
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213.	AP 213 - Stephen Hilary Underwood	A1278
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216.	AP 216 - Ian Nicholas Thomson	A1287
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217.	AP 217 - Carolyn Gordon, Northumbrian Water Ltd	A1297
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218.	AP 218 - Julie Russell on behalf of National Highways Limited	A1302
218.1	Person with Interest in Land (PIL) Reference ID: 10201	A1302
219.	AP 219 - Rosemary Carol Thomson	A1307

219.1	Person with Interest in Land (PIL) Reference ID: 7272	A1307
220.	AP 220 - Christopher Edward Broom	A1317
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221.	AP 221 - Vicky Fowler on behalf of Bloor Homes Limited	A1327
221.1	Person with Interest in Land (PIL) Reference ID: 10163	A1327
222.	AP 222 - Claire Lincoln-White	A1331
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225.	AP 225 - John Stacey	A1355
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227.	AP 227 - Linda Fisher	A1376
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228.	AP 228 - Chris Smith	A1383
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229.	AP 229 - Natalie Smith	A1391
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230.	AP 230 - John Fisher	A1399

230.1	Person with Interest in Land (PIL) Reference ID: 6961	A1399
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232.	AP 232 - ARU Writtle (Writtle University College, Anglia Ruskin University)	A1417
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236.1	Person with Interest in Land (PIL) Reference ID: The Cole Family, (multiple references,, see RR-3629 for list, of Aps) 6205 James Andrew Cole	A1448
237.	AP 237 - Joe Hearnden, BTF Partnership on behalf of the Brice Family	A1456
237.1	Person with Interest in Land (PIL) Reference ID: The Brice Family, (multiple references, see RR-3626 for list, of Aps)	A1456
238.	AP 238 - David William Salmon	A1464
238.1	Person with Interest in Land (PIL) Reference ID: 5741	A1464
239.	AP 239 - Robert Moore	A1471
239.1	Person with Interest in Land (PIL) Reference ID: 4235	A1471
240.	AP 240 - Parkers Of Leicester Limited	A1479
240.1	Person with Interest in Land (PIL) Reference ID: 10218	A1479
241.	AP 241 - Arqiva Limited	A1487

241.1	Person with Interest in Land (PIL) Reference ID: 10301	A1487
242.	AP 242 - Susan Wardale	A1492
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1. AP 1 - Michael John & Christine Clews

1.1 Person with Interest in Land (PIL) Reference ID: 9917, 10067

Please summarise (in no more than 1500 words) the reason(s) for your objection

The proposed terms provide wide ranging rights and powers to NG, and impose significant restrictions on our use of our land, both during the option period and into perpetuity.

When discussing the land use with Fisher German LLP, they indicated that NG does not intend to construct anything on our land and the proposed agreement is to enable temporary access to facilitate the construction of the proposed power line. They also indicated that this access probably would not be needed but is being sought as a precautionary measure.

The area of our land is only one acre. NG seeks rights over two tranches of land, one in the middle and one at the Eastern end of our land, this would significantly reduce the useable area of our land. Granting NG such rights would be a blight on our land that renders it practically unusable and unsellable. We believe it would be more appropriate for the terms to reflect the intended purpose

Applicant's Response

Summary of Objection

The AP objects to the proposed agreement because it grants National Grid broad, potentially perpetual rights over the AP's one-acre holding—divided into two tranches—which would materially reduce usable land and render it blighted and effectively unsellable. Fisher German LLP has confirmed NG does not intend permanent construction and is seeking only precautionary temporary access for construction, yet the current draft nevertheless permits permanent towers and oversail rights. The AP would accept narrowly defined temporary access if required, but insists the agreement be amended to remove permanent rights and to reflect the limited, temporary purpose.

Land Rights Sought

The Applicant is seeking to acquire the following permanent rights for National Grid over land in which the AP holds an interest: (a) Class 2 (overhead line infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which the AP holds an interest: (a) Class 4 (Overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant has engaged with the AP in respect of the land rights sought. A Teams meeting was held on 2 March 2026. Correspondence was subsequently received from the AP on 31 March 2026 confirming that they were not willing to proceed with the Heads of Terms at that stage. Version 2 of the Heads of Terms ("V2 HoTs") was issued to the AP on 9 April 2026, and that correspondence included an offer of a further meeting to discuss the terms.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
rather than grant wide ranging and unnecessary powers, just in case. In principle, we do not object to granting NG temporary access, if required, to facilitate construction but, we do not believe it appropriate to grant rights allowing towers to be permanently installed on our land, or oversail, when Fisher German LLP say this is not intended. We are prepared to consider terms that better reflect the intended use of our land.	The Applicant notes the AP's concern that certain rights appear broader than the activities currently anticipated on the land. The rights sought over the two areas of the AP's property have been identified through the detailed design process and are required to retain the flexibility necessary to construct, operate and maintain the authorised development. Whilst it is currently anticipated that access over these areas would only be required, if at all, to facilitate construction activities associated with the Project, the Applicant must ensure that all rights that may reasonably be required are secured through the DCO. The fact that a particular right may not ultimately be exercised does not mean it is unnecessary. The Applicant is not currently proposing to install permanent infrastructure on the AP's land, however the rights sought reflect the Project's operational requirements and provide the level of flexibility reasonably required for the delivery, operation and maintenance of the authorised development. The Applicant does not consider that the acquisition of the proposed rights would render the holding unusable or unsaleable and will continue to discuss the scope and exercise of the rights sought through ongoing negotiations with the AP. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

2. AP 2 - Janet Lesley Masterson

2.1 Person with Interest in Land (PIL) Reference ID: 4757

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Because this is MY land, my property.	Summary of Objection The AP has summarised their reasons for objection in the following terms: "Because this is MY land, my property." Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant has engaged with the AP over an extended period. Version 1 of the Heads of Terms ("V1 HoTs") was issued to the AP in October 2025. V2 HoTs were issued on 2 April 2026, which included an offer of a meeting to discuss the terms. A door knock was carried out at the AP's property on 16 June 2026. To date, the Applicant notes that the AP has not engaged with the land rights negotiation process. In respect of the specific plots of land in which this AP holds an interest, the Applicant can confirm the following. Affected plot E-5/117 refers to a section of public highway which the Applicant is seeking temporary rights over to apply a visibility splay to ensure safe design of the cross over bellmouths for the haul road. a The Applicant is aware of a discrepancy between the Land Registry title plan, the Ordnance Survey mapping and the adopted highway boundary. It appears that the AP may have inadvertently become an affected person in relation to certain plots as a result of this discrepancy, and the Applicant has no plan to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

access the AP's private land in this location. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide compliant and safe visibility at the crossover. Affected Plot E-5/120 refers to an area needed to provide the Applicant permanent access rights to maintain the asset. The extent of Order Limits for this access cross over a corner of the AP's garden, the Applicant confirms that this is an error. The Applicant's intention is for that plot to be redesignated as Class 8 ("white land"), meaning no powers of compulsory acquisition or temporary possession will be sought over it. The Applicant will not seek to take any part of the AP's garden for access purposes.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

3. AP 3 - Frances Williams

3.1 Person with Interest in Land (PIL) Reference ID: 8663

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP . Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant has engaged with the AP in respect of the land rights sought. V2 HoTs were issued to the AP on 26 March 2026, which included an offer of a meeting to discuss the terms. A telephone call was held with the AP on 11 May 2026. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

4. AP 4 - Catherine Judith Chamaud (as director of Westlands Farm Developments Ltd)

4.1 Person with Interest in Land (PIL) Reference ID: 15364

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Failure of NG and UKPN to recognise the impact of their proposals on the proposed residential development at Lynton, and the lack of any meaningful engagement with the land owner and developer, to resolve technical and design issues in a way that is commercially viable to all parties.	Summary of Objection The AP has summarised their reasons for objection as follows: a failure of National Grid and UK Power Networks to recognise the impact of the Project on a proposed residential development at Lynton, and a lack of meaningful engagement to resolve the associated technical and design issues. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation. A Teams meeting was held with the AP on 8 May 2026. A further joint Teams meeting was held on 4 June 2026 with Fisher German, National Grid and UKPN together. The AP has declined to grant a survey

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

licence, which has had implications for the progress of directional drill assessments. Alternative cable routes have been provided to the AP for consideration, and the AP's proposed development plan has been provided to UKPN. UKPN is currently seeking a 10-metre cable easement, and further discussions on the cable route and the overlay with the AP's development proposals are ongoing. The Applicant is committed to minimising impacts on the AP's proposed development where practicable.

In relation to UKPN's position, UK Power Networks held a meeting with the affected party jointly with National Grid and Fisher German on the 4th June to review the proposals for the identified land parcels. The landowner has requested that UK Power Networks consider alternative routing for the proposed 132kV cable. UK Power Networks are currently reviewing these proposals, however, note that all three proposals fall outside of the red line boundary for the Norwich to Tilbury scheme. UK Power Networks will continue to work with the affected party to minimise impacts as far as practicable, and reach a voluntary agreement where possible.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

5. AP 5 - Nicholas Dent

5.1 Person with Interest in Land (PIL) Reference ID: 5156

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I don't want my land destroyed, hedges being removed and trees. don't want the disruption and I will have land impossible to farm and I don't want bullying by ng	Summary of Objection The AP has summarised their reasons for objection as follows: the AP objected to the proposed works, citing the disruption, destruction of associated vegetation and what they perceive as bullying behaviour. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant has engaged extensively with the AP in respect of the land rights sought and the AP's concerns regarding impacts on the land and farming operations. A site meeting was held with Nicholas Dent at his property on 21 January 2026, at which mitigation measures were discussed in detail, including in relation to hedgerows. The AP's concerns were relayed to National Grid Electricity Transmission following that meeting. A further meeting was held with the AP's professional representative, Richard Prentice, on 26 May 2026, at which Heads of Terms plan amendments and a potential reduction in the land area to be included within the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Order Limits were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to minimising impacts on the holding and reaching a voluntary agreement.

In respect of the AP's concerns regarding the removal of hedgerows and trees, the Applicant can confirm the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project. Where it is necessary to remove hedgerows and trees, replacement planting would be provided.

The Applicant can confirm that some plots refer to a section of public highway which the Applicant is seeking temporary rights over to apply a visibility splay to ensure safe design of the cross over bellmouths for the haul road. The Applicant is aware of a discrepancy between the Land Registry title plan, the Ordnance Survey mapping and the adopted highway boundary. It appears that the AP may have inadvertently become an affected person in relation to certain plots as a result of this discrepancy, and the Applicant has no plan to access the AP's private land in this location. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide compliant and safe visibility at the crossover, however these will be retained where possible..

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the environmental impacts of the Project, including on landscape, ecology, biodiversity, trees and hedgerows. In respect of those concerns, the Applicant refers to its Environmental Statement and the suite of supporting technical documents submitted as part of its application for development consent. The Applicant acknowledges that the Project will have temporary impacts during construction and some limited permanent impacts. However, the Applicant is satisfied that its Environmental Statement has properly and comprehensively assessed those impacts in accordance with the applicable legislative and regulatory requirements, and that appropriate mitigation measures are proposed to reduce impacts to the lowest reasonably practicable level. The Applicant submits that no significant residual adverse effects on the environment remain after mitigation is taken into account.

A number of APs have raised concerns in relation to the impact of the Project on agricultural land and farming businesses. In particular, concerns have been raised regarding: impacts on agricultural operations during construction, including the severance of land holdings and disruption to farm management; the permanent loss of farmland, including Best and Most Versatile ("BMV") agricultural land; and the adequacy of proposed mitigation and compensation measures. The Applicant has had regard to agricultural land impacts throughout its route options appraisal process and the development of the detailed Project design, seeking to minimise impacts on BMV agricultural land in particular. The Applicant acknowledges that the Project will have an impact on the agricultural operations of affected landowners during construction and, to a lesser extent, during operation. The Applicant is committed to working with affected landowners and their representatives to understand and minimise the disruption to agricultural operations where it is reasonably practicable to do so. The Applicant acknowledges that it will not be possible to resolve or agree all mitigation measures until detailed design is more advanced. Compensation for agricultural impacts will be dealt with on a case-by-case basis in accordance with the Compensation Code and, where applicable, the discretionary payments included in the Applicant's Land Rights Strategy. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant will give prior warning to landowners before commencing works that may affect livestock, to allow appropriate management arrangements to be put in place.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

A number of APs have raised concerns regarding impacts on the Project during construction, including impacts from haul roads, drainage works, site compounds, construction vehicles, noise, vibration and dust. The Applicant acknowledges that construction of the Project will have temporary adverse impacts on the surrounding area and on individual landowners and occupiers, including those who farm the land. The Applicant's Code of Construction Practice sets out the measures that will be applied by the Applicant and its contractors to manage and mitigate those impacts during construction. The Applicant is committed to working with affected landowners and occupiers to seek to agree construction mitigation and accommodation works on a case-by-case basis, having regard to the particular circumstances of each holding, and will keep affected parties informed of the construction programme as it develops.

6. AP 6 - Martin Baxter

6.1 Person with Interest in Land (PIL) Reference ID: 6777

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object	Summary of Objection The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant has engaged with the AP in respect of the land rights sought. V2 HoTs were issued to the AP on 26 March 2026, which included an offer of a meeting to discuss the terms. A telephone call was held with the AP on 11 May 2026. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

7. AP 7 - David Robert Miles, Sheila Miles

7.1 Person with Interest in Land (PIL) Reference ID: 2692, 28376

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Pylon Line goes through an area of the farm that has been in an Environmental Scheme for a number of years, and all the good things that we have achieved for the environment, bird numbers and wildlife in general, will be decimated	Summary of Objection The AP has summarised their reasons for objection as follows: the AP objects to the proposed pylon route, arguing it will significantly harm the environmental, benefits that has been achieved through an Environmental Scheme. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant has engaged with the AP over an extended period. A meeting was held on 21 January 2026 with the AP and their agent Richard Prentice (Durrants), at which the Heads of Terms and accommodation works were discussed, including matters relating to the shoot and environmental schemes operating on the holding and the potential for those impacts to be taken into account in the context of compensation. V2 HoTs were issued to the AP on 9 April 2026, which included an offer of a further meeting to discuss the terms. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. A further email was sent to the AP's representative on 26 June 2026 regarding the provision of crossing points across the construction corridor. The Applicant notes the importance of the environmental scheme to the AP and confirms that its impacts on such schemes and the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

associated compensation will be considered on a case-by-case basis in accordance with the Compensation Code.

In respect of the AP's concerns regarding the impact of the Project on the natural environment, ecology and wildlife, the Applicant confirms that the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added):

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

"Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the environmental impacts of the Project, including on landscape, ecology, biodiversity, trees and hedgerows. In respect of those concerns, the Applicant refers to its Environmental Statement and the suite of supporting technical documents submitted as part of its application for development consent. The Applicant acknowledges that the Project will have temporary impacts during construction and some limited permanent impacts. However, the Applicant is satisfied that its Environmental

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Statement has properly and comprehensively assessed those impacts in accordance with the applicable legislative and regulatory requirements, and that appropriate mitigation measures are proposed to reduce impacts to the lowest reasonably practicable level. The Applicant submits that no significant residual adverse effects on the environment remain after mitigation is taken into account.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

8. AP 8 - Gareth Pressley

8.1 Person with Interest in Land (PIL) Reference ID: 13564

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
My property is not your standard empty field or farm land. We are a small holding and we have animals for meat which we breed ourselves. We grow fruit and veg, make our own compost, We have bee's for honey and so much more. National grids project and use of our land will decimate it, we have cable towers and nets, haul roads and drainage, all spread out over the entirety of our 4 acres. Simply put they will destroy our families way to feed itself and much more. There is no regard for green space, nature, animals or peoples mental health. We have been threatened on our doorstep by representatives, and have had meetings with more people than we can count and every time is a different person, different plan amounting to the same thing, and different contradictory information, even the plans submitted to the authorities are different to what we received with basic heads of terms. Its farcical and purposefully mis directional.	Summary of Objection The AP has summarised their reasons for objection as follows: The four-acre smallholding sustains the family—livestock for meat, fruit and vegetables, composting and beekeeping—but National Grid’s proposed cable towers, nets, haul roads and drainage would spread across the site and destroy its productivity and biodiversity. Consultations have been inconsistent, threatening, misleading and have caused distress; fair, transparent engagement is demanded. The Applicant notes the Affected Person's concerns regarding their experience of engagement with representatives acting on behalf of the Project. The Applicant does not accept that any threats have been made to the Affected Person. Engagement has been undertaken to provide information about the Project, understand the Affected Person's circumstances and seek to reach agreement where possible. A number of representatives and technical specialists have been involved at different stages of the Project to address specific matters, which may have resulted in engagement being undertaken by different individuals. The Applicant remains committed to constructive and respectful engagement with the Affected Person and will continue to seek to address their concerns through ongoing discussions. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant has engaged with the AP over an extended period. V2 HoTs were issued to the AP on 9 April 2026, which included an offer of a meeting to discuss the terms. A site meeting was then held on 29 May 2026 with the AP, their agent and National Grid representatives, at which detailed mitigation and accommodation works were discussed, including the haul road, drainage arrangements, scaffolding requirements, site security and reinstatement. Queries raised at that meeting are being reviewed internally by the Applicant. A further meeting was held with the AP's agent on 9 June 2026 to continue discussions on accommodation works. The AP's representative also attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which Heads of Terms and land rights matters were discussed. The Applicant is committed to continuing to work with the AP to resolve their concerns regarding the construction methodology as far as is reasonably practicable.

In respect of the AP's concern regarding the overhead line alignment and any oversail of their land, the Applicant confirms that its routing and siting approach has been carried out in accordance with the Holford Rules. To avoid the overhead line oversailing the AP's land, it would be necessary to introduce an additional angle pylon into the alignment. The Applicant does not consider this to be a proportionate change and no alteration to the overhead line alignment is proposed at this location.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 and, in particular, to its submissions regarding Paragraph 25 of the Guidance. Paragraph 25 says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns in relation to the impact of the Project on agricultural land and farming businesses. The Applicant has had regard to agricultural land impacts throughout its route options appraisal process and the development of the detailed Project design, seeking to minimise impacts on BMV agricultural land in particular. The Applicant is committed to working with affected landowners and their representatives to understand and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

minimise the disruption to agricultural operations where it is reasonably practicable to do so. Compensation for agricultural impacts will be dealt with on a case-by-case basis in accordance with the Compensation Code and, where applicable, the discretionary payments included in the Applicant's Land Rights Strategy. The Applicant will give prior warning to landowners before commencing works that may affect livestock, to allow appropriate management arrangements to be put in place.

In respect of the AP's concerns regarding the impacts to nature and animals, the Applicant can confirm the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and the impact of the Project on the natural environment, the Applicant confirms that the design and routing of the Project has had regard to biodiversity throughout. Ecological surveys were undertaken between 2022 and 2025. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** The OLEMP and CoCP contain appropriate mitigation measures to protect ecology and biodiversity during and after construction. Where hedgerows and trees are required to be removed as part of the Project, replacement planting will be provided. The Applicant's assessment concludes that there are no significant residual effects on ecology and biodiversity having regard to the mitigation measures proposed.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1, in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The **4.2 Funding Statement [REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have raised concerns regarding impacts during construction, including impacts from haul roads, drainage works, site compounds, construction vehicles, noise, vibration and dust. The Applicant acknowledges that construction will have temporary adverse impacts, and its Code of Construction Practice sets out the measures that will be applied to manage and mitigate those impacts. The Applicant is committed to working with affected landowners and occupiers to seek to agree construction mitigation and accommodation works on a case-by-case basis, having regard to the particular circumstances of each holding, and will keep affected parties informed of the construction programme as it develops.

9. AP 9 - Robert James Capps

9.1 Person with Interest in Land (PIL) Reference ID: 15838

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I own the house. No idea where you want to access as you haven't told me	Summary of Objection The AP has summarised their reasons for objection as follows: "I own the house. No idea where you want to access as you haven't told me." Land Rights Sought Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. Consolidated Response The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 5 (access). No rights are sought for UKPN over land in which this AP holds an interest and no powers of temporary possession are sought in relation to this AP's land interest. The Applicant is able to clarify the nature of the access right being sought. The permanent access right required over plot B-12/107 is needed to enable National Grid to access the overhead line span between pylons RG165 and RG166. That span is partly located between the railway line and the River Gipping. The permanent access right will be exercised only

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

infrequently, for the purposes of the inspection and maintenance of Project infrastructure. The Applicant confirms that the most suitable route for exercising access at any particular time would be agreed with the AP at the time of access. The Applicant remains willing to meet with the AP to discuss the nature of the access right in further detail.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Those directly affected by the Order will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1, the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. Section 123 of the PA 2008 provides

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met.

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant considers that it has acted, and continues to act, in full accordance with the Guidance, including Paragraph 25 thereof which acknowledges that for long, linear schemes it may not always be practicable to acquire by agreement each plot of land and that it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset.

A number of APs have raised concerns about the nature and extent of the permanent access rights sought by the Applicant. The Applicant confirms that permanent access rights are sought only where they are strictly necessary to provide access to Project infrastructure for the purposes of ongoing inspection and maintenance. Where permanent access rights are sought, the Applicant will only exercise those rights infrequently, for the specific purpose of accessing the relevant infrastructure. The Applicant's intention is that the route taken to access the infrastructure at any given time will be agreed with the relevant landowner at the time of access, to minimise disruption to the land and its use.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1, in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

10. AP 10 - Matthew Gementera

10.1 Person with Interest in Land (PIL) Reference ID: 15953

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant confirms that no permanent rights are sought over land in which this AP holds an interest. Powers of temporary possession (Class 7) only are sought for National Grid in connection with the Project over land in which this AP holds a subsoil interest. The Applicant's preference is at all times to reach a voluntary agreement with affected landowners in respect of the exercise of temporary possession powers. Consolidated Response The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. "

11. AP 11 - Joel Woolf

11.1 Person with Interest in Land (PIL) Reference ID: 1918

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The proposed right take around the headlands and not the centre but remove access to the centre during works. This is unacceptable and sterilises the entirety to my land because the proposal is to take the only access into the remaining land	Summary of Objection The AP has summarised their reasons for objection as follows: the AP is concerned the proposed rights sterilises the entirety of the land because it would take the only means of access into the remaining land. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation Consolidated Response In respect of the AP's concerns regarding agricultural land impacts, the Applicant confirms that it has had regard to impacts on agricultural land throughout its route options appraisal process and the development of the detailed Project design, seeking to minimise impacts on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Best and Most Versatile agricultural land in particular. During construction, the Applicant will seek to minimise disruption to agricultural operations and will give prior warning to landowners before commencing works that may affect livestock. The Applicant is committed to working with affected landowners to understand and minimise construction disruption where it is reasonably practicable to do so. Compensation for agricultural impacts will be dealt with on a case-by-case basis in accordance with the Compensation Code and, where applicable, the discretionary payments included in the Applicant's Land Rights Strategy.

During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

In respect of the specific land rights sought over this AP's land, the Applicant confirms that the rights have been formulated by reference to the design solution agreed between the Applicant and UKPN. The rights sought permit the underground cabling to run around the edges of the relevant fields or straight across the field adjacent to the existing overhead line, depending on the final detailed design outcome.

The Applicant notes the AP's concern that the acquisition of rights around the field boundary could sterilise the wider field. The rights sought do not prevent the continued agricultural use

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of the land, save where temporary restrictions are required during construction or where necessary to protect the operational integrity and safe access to the underground electricity infrastructure once installed. The extent of any restrictions has been limited to those reasonably required for the undertaking and the final detailed design will seek, where reasonably practicable, to minimise impacts on the operation of the holding.

Engagement with UKPN and affected persons on this matter is ongoing as the detailed design for the underground cable element of the Project progresses. The Applicant remains committed to engaging with the AP and their representatives to understand the specific operational concerns associated with the holding and to seek to minimise impacts through the detailed design process. Any diminution in land value or losses arising from the exercise of compulsory acquisition powers would be compensable in accordance with the statutory compensation code. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1, the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding Section 123 of the Planning Act 2008. The Applicant respectfully disagrees. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is met.

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant considers that it has acted, and continues to act, in full accordance with the Guidance, including Paragraph 25 thereof which acknowledges that for long, linear schemes it may not always be practicable to acquire by agreement each plot of land.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1, in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

12. AP 12 - Antony Francis Goddard

12.1 Person with Interest in Land (PIL) Reference ID: 3302

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant’s Response

Summary of Objection

No written reasons for objection have been provided by the AP.

Land Rights Sought

The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). No powers of temporary possession (Class 7) are sought in relation to this AP's land.

Consolidated Response

The Applicant has engaged with the AP in respect of the land rights sought and associated mitigation and accommodation works matters. Heads of Terms negotiations are ongoing with the AP's professional representatives, and meetings have been held with the AP's agent to discuss those negotiations together with mitigation and accommodation works proposals. The AP's professional representative attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. "

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

13. AP 13 - Trevor George Musk

13.1 Person with Interest in Land (PIL) Reference ID: 6377

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). No powers of temporary possession (Class 7) are sought in relation to this AP's land. Consolidated Response The Applicant has engaged with the AP in respect of the land rights sought and associated mitigation and accommodation works matters. Heads of Terms negotiations are ongoing with the AP's professional representatives, and meetings have been held with the AP's agent to discuss those negotiations together with mitigation and accommodation works proposals. The AP's professional representative attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

14. AP 14 - Linda Jane Goddard

14.1 Person with Interest in Land (PIL) Reference ID: 3980

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). No powers of temporary possession (Class 7) are sought in relation to this AP's land. Consolidated Response The Applicant has engaged with the AP in respect of the land rights sought and associated mitigation and accommodation works matters. Heads of Terms negotiations are ongoing with the AP's professional representatives, and meetings have been held with the AP's agent to discuss those negotiations together with mitigation and accommodation works proposals. The AP's professional representative attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

15. AP 15 - Ann Dent

15.1 Person with Interest in Land (PIL) Reference ID: 2652

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Sick of all of it,don't want my farmland ruined or hedges and trees removed	Summary of Objection The AP has summarised their reasons for objection in the following terms: "Sick of all of it, don't want my farmland ruined or hedges and trees removed." Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant will continue to engage with affected landowners to understand site-specific concerns and to minimise disruption to agricultural operations during construction. Where disruption cannot be avoided, the Applicant will compensate affected parties in line with the compensation code. The Applicant has engaged with the AP in respect of the land rights sought and the AP's concerns regarding impacts on the land and farming operations. A site meeting was held with the AP at the property on 21 January 2026, at which mitigation measures were discussed in detail, including in relation to the treatment of hedgerows. The AP's concerns were relayed to National Grid Electricity Transmission following that meeting. A further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

meeting was held with the AP's spokesperson's representative, Richard Prentice (Durrants) on 26 May 2026, at which Heads of Terms plan amendments and a potential reduction in the land area to be included within the Order Limits were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to minimising impacts on the holding and reaching a voluntary agreement.

In respect of the AP's concerns regarding the impacts to farmland and removal of hedgerows and trees, the Applicant can confirm the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and the impact of the Project on the natural environment, the Applicant confirms that the design and routing of the Project has had regard to biodiversity throughout. Ecological surveys were undertaken between 2022 and 2025. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** (oLEMP) and **7.2 Outline Code of Construction Practice [Revision G]** (CoCP). The oLEMP and oCoCP contain appropriate mitigation measures to protect ecology and biodiversity during and after construction. Where hedgerows and trees are required to be removed as part of the Project, replacement planting will be provided. The Applicant's assessment concludes that there are no significant residual effects on ecology and biodiversity having regard to the mitigation measures proposed.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Those directly affected by the Order will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for loss or damage caused by the exercise of powers by the Applicant.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met as set out in **[REP3-010]**. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

The Applicant considers that it has acted, and continues to act, in full accordance with the MHCLG (2013) Guidance, including Paragraph 25 thereof which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset.

A number of APs have raised concerns regarding the environmental impacts of the Project, including on landscape, ecology, biodiversity, trees and hedgerows. In respect of those concerns, the Applicant refers to its Environmental Statement and the suite of supporting technical documents submitted as part of its application for development consent. The Applicant acknowledges that the Project will have temporary impacts during construction and some limited permanent impacts. However, the Applicant is satisfied that its Environmental Statement has properly and comprehensively assessed those impacts in accordance with the applicable legislative and regulatory requirements, and that appropriate mitigation measures are proposed to reduce impacts to the lowest reasonably practicable level. The Applicant submits that no significant residual adverse effects on the environment remain after mitigation is taken into account.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

16. AP 16 - Georgina Sally Green

16.1 Person with Interest in Land (PIL) Reference ID: 4862

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We farm this land and the construction of the pylons will make it much harder to farm with agricultural machinery. Once the pylons are installed there may be areas of land that are too small to be economically farmed.	Summary of Objection The AP has summarised their reasons for objection as follows: the AP farms the land in question; pylon construction will make it harder to farm and the areas remaining between and around the pylons may be too small to economically farm once the pylons are installed. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant has engaged with the AP over an extended period. The Applicant is aware that two pylons are located on the AP's land. A meeting was held with the AP and their agent on 1 June 2026, at which the construction corridor and associated re-fencing requirements were discussed. At that meeting, the Applicant confirmed that it will communicate the project programme to the AP, that it is committed to mitigating the effects of the Project on the AP's farming operations to the extent reasonably practicable, and that it will endeavour to facilitate the provision of crossing points across the construction corridor to enable the AP to continue

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to use and manage their land during the construction phase. The Applicant also confirmed at that meeting that the Compensation Code will apply in respect of any loss or damage caused to the AP by the exercise of the Applicant's powers. V2 HoTs were issued to the AP on 2 April 2026 with an offer of a meeting, and a telephone call was also held on 2 April 2026. A further meeting was held on 20 April 2026 with the AP and their representatives, at which crossing points, the AP's continued use of the land during construction, and the protection of memorial trees on the holding were discussed. The AP's representative also attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns in relation to the impact of the Project on agricultural land and farming businesses. In particular, concerns have been raised regarding: impacts on agricultural operations during construction, including the severance of land holdings and disruption to farm management; the permanent loss of farmland, including Best and Most Versatile ("BMV") agricultural land; and the adequacy of proposed mitigation and compensation measures. The Applicant has had regard to agricultural land impacts throughout its route options appraisal process and the development of the detailed Project design, seeking to minimise impacts on BMV agricultural land in particular. The Applicant acknowledges that the Project will have an impact on the agricultural operations of affected landowners during construction and, to a lesser extent, during operation. The Applicant is committed to working with affected landowners and their representatives to understand and minimise the disruption to agricultural operations where it is reasonably practicable to do so. The Applicant acknowledges that it will not be possible to resolve or agree all mitigation

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

measures until detailed design is more advanced. Compensation for agricultural impacts will be dealt with on a case-by-case basis in accordance with the Compensation Code and, where applicable, the discretionary payments included in the Applicant's Land Rights Strategy. The Applicant will give prior warning to landowners before commencing works that may affect livestock, to allow appropriate management arrangements to be put in place.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

A number of APs have raised concerns regarding impacts on the Project during construction, including impacts from haul roads, drainage works, site compounds, construction vehicles, noise, vibration and dust. The Applicant acknowledges that construction of the Project will have temporary adverse impacts on the surrounding area and on individual landowners and occupiers, including those who farm the land. The Applicant's Code of Construction Practice sets out the measures that will be applied by the Applicant and its contractors to manage and mitigate those impacts during construction. The Applicant is committed to working with affected landowners and occupiers to seek to agree construction mitigation and accommodation works on a case-by-case basis, having regard to the particular circumstances of each holding, and will keep affected parties informed of the construction programme as it develops.

17. AP 17 - Bernard William Green

17.1 Person with Interest in Land (PIL) Reference ID: 4679

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We farm this land and the construction of the pylons will make it much harder to farm with agricultural machinery. Once the pylons are installed there may be areas of land that are too small to be economically farmed.	Summary of Objection The AP has summarised their reasons for objection as follows: the AP farms the land in question; pylon construction will make it harder to farm and the areas remaining between and around the pylons may be too small to economically farm once the pylons are installed. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). The Applicant has engaged with the AP over an extended period. The Applicant is aware that two pylons are located on the AP's land. A meeting was held with the AP and their agent on 1 June 2026, at which the construction corridor and associated re-fencing requirements were discussed. At that meeting, the Applicant confirmed that it will communicate the project programme to the AP, that it is committed to mitigating the effects of the Project on the AP's farming operations to the extent reasonably practicable, and that it will endeavour to facilitate the provision of crossing points across the construction corridor to enable the AP to continue to use and manage their land during the construction phase. The Applicant also confirmed

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the Compensation Code will apply in respect of any loss or damage caused to the AP by the exercise of the Applicant's powers. V2 HoTs were issued to the AP on 2 April 2026 with an offer of a meeting, and a telephone call was held on 2 April 2026. A further meeting was held on 20 April 2026 with the AP and their representatives, at which crossing points, the AP's continued use of the land during construction, and the protection of memorial trees on the holding were discussed. The AP's representative also attended the Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed.

During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives **[Revision B]**. During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land and disturbance) assessed on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

A number of APs have raised concerns regarding impacts on the Project during construction, including impacts from haul roads, drainage works, site compounds, construction vehicles, noise, vibration and dust. The Applicant acknowledges that construction of the Project will have temporary adverse impacts on the surrounding area and on individual landowners and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	occupiers, including those who farm the land. The Applicant's Code of Construction Practice sets out the measures that will be applied by the Applicant and its contractors to manage and mitigate those impacts during construction. The Applicant is committed to working with affected landowners and occupiers to seek to agree construction mitigation and accommodation works on a case-by-case basis, having regard to the particular circumstances of each holding, and will keep affected parties informed of the construction programme as it develops.

18. AP 18 - Gillian Leeks, Malcolm Leeks

18.1 Person with Interest in Land (PIL) Reference ID: 2596, 4478

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to any compulsory purchase or any interference with our land on the basis it's our privately owned land and we do not want pylons buzzing interfering with the peace of the countryside. This is why we purchased the land. It's our right as landowners to protect the countryside.	Summary of Objection The AP has summarised their reasons for objection as follows: the AP objects to any compulsory purchase or interference with the privately owned land and oppose the erection of pylons that would disturb the peace of the countryside. Protecting the countryside and preserving the land's tranquillity is why they bought the land and a right they assert as landowners.. Land Rights Sought The Applicant notes that the interest held by the APs is a Category 2 interest in plot B-12/104. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. Consolidated Response A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the environmental impacts of the Project, including on landscape, ecology, biodiversity, trees and hedgerows. In respect of those concerns, the Applicant refers to its Environmental Statement and the suite of supporting technical documents submitted as part of its application for development consent. The Applicant acknowledges that the Project will have temporary impacts during construction and some limited permanent impacts. However, the Applicant is satisfied that its Environmental Statement has properly and comprehensively assessed those impacts in accordance with the applicable legislative and regulatory requirements, and that appropriate mitigation measures are proposed to reduce impacts to the lowest reasonably practicable level. The Applicant submits that no significant residual adverse effects on the environment remain after mitigation is taken into account.

A number of APs have raised concerns about the nature and extent of the permanent access rights sought by the Applicant. The Applicant confirms that permanent access rights are sought only where they are strictly necessary to provide access to Project infrastructure for the purposes of ongoing inspection and maintenance. Where permanent access rights are sought, the Applicant will only exercise those rights infrequently, for the specific purpose of accessing the relevant infrastructure. The Applicant's intention is that the route taken to access the infrastructure at any given time will be agreed with the relevant landowner at the time of access, to minimise disruption to the land and its use.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

19. AP 19 - Mark Ian Hoskin

19.1 Person with Interest in Land (PIL) Reference ID: 14202

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid. The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational	Summary of Objection The AP has summarised their reasons for objection as follows: the Project would cause serious and long-term harm to the AP's farm and holiday lodge business; the land is essential to the operation of the business, and its loss or restriction would reduce farming effectiveness and cause significant damage to the commercial performance of the holiday accommodation. The AP raises concerns about a significant loss of income, and states that it is unclear exactly what land will be subject to compulsory acquisition. The AP also objects to the negative effect on property value and considers that alternatives, such as an access agreement rather than formal powers of acquisition, have not been adequately explored. The AP submits that the level of harm arising from the Project would be substantial, avoidable and disproportionate. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 5 (access). No rights are sought for UKPN over land in which this AP holds an interest. Consolidated Response The Applicant has engaged with the AP over an extended period. A meeting was held with the AP on 21 January 2026, at which the AP raised concerns about the impact of the Project on their holiday letting business, mitigation measures during construction, and the approach to compensation. Heads of Terms negotiations have been ongoing and V2 HoTs were issued to the AP on 9 April 2026 with an offer of a further meeting to discuss the terms. The AP's representative attended the Agent's Group Meeting with Fisher German and National

Please summarise (in no more than 1500 words) the reason(s) for your objection

capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us.

In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued.

Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.

Applicant's Response

Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. A further email was sent to the AP's representative regarding crossing points across the construction corridor.

In respect of the specific access right being sought over the AP's land, the Applicant can confirm the following. The permanent access right is required to enable National Grid to access pylon RG89 using an existing public highway access point and a gap in the existing hedge. This access right would be used only infrequently, for the purposes of inspections and maintenance of the overhead line infrastructure. The Applicant recognises the sensitivity of the AP's position given the co-location of the farming operation with the holiday accommodation business and is committed to minimising disruption to those operations throughout the life of the Project. The most suitable route for exercising the access right at any particular time would therefore be agreed with the AP at the time of access. This, together with the provision of information about access duration and nature of works, would help minimise disruption to the AP's farming and business operations.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns in relation to the impact of the Project on agricultural land and farming businesses. In particular, concerns have been raised regarding: impacts on agricultural operations during construction, including the severance of land holdings and disruption to farm management; the permanent loss of farmland, including Best and Most Versatile ("BMV") agricultural land; and the adequacy of proposed mitigation and compensation measures. The Applicant has had regard to agricultural land impacts throughout its route options appraisal process and the development of the detailed Project design, seeking to minimise impacts on BMV agricultural land in particular. The Applicant acknowledges that the Project will have an impact on the agricultural operations of affected

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

landowners during construction and, to a lesser extent, during operation. The Applicant is committed to working with affected landowners and their representatives to understand and minimise the disruption to agricultural operations where it is reasonably practicable to do so. The Applicant acknowledges that it will not be possible to resolve or agree all mitigation measures until detailed design is more advanced. Compensation for agricultural impacts will be dealt with on a case-by-case basis in accordance with the Compensation Code and, where applicable, the discretionary payments included in the Applicant's Land Rights Strategy. The Applicant will give prior warning to landowners before commencing works that may affect livestock, to allow appropriate management arrangements to be put in place.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

A number of APs have raised concerns regarding impacts on the Project during construction, including impacts from haul roads, drainage works, site compounds, construction vehicles, noise, vibration and dust. The Applicant acknowledges that construction of the Project will have temporary adverse impacts on the surrounding area and on individual landowners and occupiers, including those who farm the land. The Applicant's Code of Construction Practice sets out the measures that will be applied by the Applicant and its contractors to manage and mitigate those impacts during construction. The Applicant is committed to working with affected landowners and occupiers to seek to agree construction mitigation and accommodation works on a case-by-case basis, having regard to the particular

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

circumstances of each holding, and will keep affected parties informed of the construction programme as it develops.

20. AP 20 - Helen Phillips

20.1 Person with Interest in Land (PIL) Reference ID: 6457

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the installation of 7 pylons in such a small village, encroaching on the landscape and wildlife, also on a personal level. There will be major disruption around this build and the landscape will never be the same	Summary of Objection The AP has summarised their reasons for objection as follows: the AP objects to the installation of seven pylons in a small village; the AP considers this will cause major disruption and encroach on the landscape and wildlife. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project

Consolidated Response

The Applicant has sought to reduce, as far as practicable, potential impacts on visual receptors, through routeing and siting. The Applicant notes the concern related to views from Faulkbourne. Effects on visual receptors within White Notley and Faulkbourne parish are set out under Visual Receptor Area (VRA) E4 (paragraphs 13.8.35 to 13.8.46), VRA E5 (paragraphs 13.8.47 to 13.8.58) and VRA E6 (paragraphs 13.8.59 to 13.8.70) in Section 13.8 in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [Revision B]**. Significant visual effects are identified within approximately 1.5 km of the Project, including views from Faulkbourne. Views from the edge of Faulkbourne are represented by Viewpoint 5.12 in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [Revision B]**. The visual effect of the Project from this viewpoint is assessed as significant, as the Project would be visible in open views as it crosses the Brain Valley.

Effects on landscape receptors within White Notley and Faulkbourne parish are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [Revision B]** under Landscape Character Area (LCA) B1 Central Essex Farmland in paragraphs 13.3.654 to 13.3.678 and LCA C6 Blackwater and Brain Valley in paragraphs 13.3.679 to 13.3.698. Significant effects are identified within approximately 1.5 km of the Project. Although significant landscape and visual effects have been identified, the rural farmland landscape will remain in place beneath and around the proposed overhead line.

In respect of the AP's concerns about the alignment of the Project in the area, the Applicant confirms that it has carefully considered requests to change the proposed alignment. Moving the route northwards would bring it closer to the southern edge of White Notley village and to the Scheduled Monument and Grade I listed buildings at Cressing Temple. The proposed alignment has a smaller number of residential receptors within its zone of visual influence and is in excess of one kilometre from the Grade I listed buildings at Faulkbourne Hall. The proposed alignment is also preferable to alternative alignments in terms of its consistency with Holford Rule Two.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have Informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

21. AP 21 - Jane Wendy Betts. Also as representative to the estate of John Gavin Betts (deceased) of same address.

21.1 Person with Interest in Land (PIL) Reference ID: 9143, 28095

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of Jane Wendy Betts, acting also as representative to the estate of John Gavin Betts (deceased) of the same address. No specific reasons for objection have been set out in this AP's written representation. Land Rights Sought The APs are noted as having Category 2 interests on the plots A-3/9, A-3/14-15. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. Consolidated Response The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

22. AP 22 - Amy Frances Travell

22.1 Person with Interest in Land (PIL) Reference ID: 14201

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid.	Summary of Objection The Applicant understands that the AP's objection relates to: • the serious and long-term harm that would be caused to the operation and financial stability of her farm and holiday lodge business; • concerns about the impact on the business's income, setting, appeal and commercial performance; • uncertainty as to the precise land to be acquired given perceived misalignments in the Land Rights Tracker [REP4-051] with previously discussed areas; • the potential negative effect on the value and saleability of the property; • and the contention that alternatives, including access agreements and other cooperative arrangements, have not been properly explored and that any arrangement would need to include appropriate compensation. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 5 (access) on Plots B-1/13 and B-1/14 Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and her representatives. A meeting was held with the AP and her agents on 21 January 2026, at which concerns regarding the impact on her holiday lets

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us. In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued. Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.

business were discussed, as were potential mitigation measures during construction and the matter of compensation. Heads of Terms ("HoTs") negotiations are ongoing with the AP and her agent, including meetings to engage with the AP regarding practical matters associated with the Project. Version 2 of the HoTs was sent on 9 April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. An email was also sent to the AP's representative regarding crossing points.

The Applicant notes the AP's concern that the Detailed Land and Rights Negotiations Tracker [REP4-051] does not align with previous discussions. The Applicant does not agree that there is any inconsistency. The Applicant is seeking only **Class 5 (access) rights over Plots B-1/13 and B-1/14** in which the AP holds a freehold and occupational interest. No permanent acquisition of land is sought and no permanent Project infrastructure is proposed within those plots. The rights sought relate solely to access required for the operation and maintenance of pylon RG89 and are consistent with the rights identified through the ongoing engagement process and recorded within the Detailed Land and Rights Negotiations Tracker. The Applicant further considers that the limited nature of the rights sought would not give rise to the significant long-term impacts alleged in respect of the continued operation of the farming enterprise or holiday lodge business, given that the rights would be exercised only intermittently for inspection, maintenance and related operational activities.

The Applicant has engaged with the AP and her representatives regarding access arrangements and remains willing to discuss reasonable alternatives to the proposed access route where practicable. Discussions have included site-specific operational requirements, accommodation works and potential alternative forms of access. Through the ongoing engagement process, including Heads of Terms negotiations and consideration of landowner requests, the Applicant will continue to review any proposals put forward by the AP that may reduce impacts whilst still enabling the safe construction, operation and maintenance of the Project. The Applicant therefore considers that both the rights sought and the information presented within the Detailed Land and Rights Negotiations Tracker are consistent with the documented engagement undertaken by Fisher German and National Grid. The Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and regular twice weekly meetings are conducted to triage, seek to identify common themes across PILs and identify

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and seek the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process and does not anticipate that the register will close for requests and consideration in the future. The focus at this time continues to be the matters that should be negotiated as part of HoTs rather than simply practical matters that would be dealt with through the usual agricultural liaison / pre-entry schedule of condition workstream at the commencement of main works

Impacts on the visitor economy and visitor accommodation are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism **[Revision C]** which notes that there could be both direct and indirect economic effects on individual businesses as a result of the construction and operation of the Project including, for example, loss of business to visitor accommodation during construction. As mentioned, potential mitigation to effects and any compensation (which falls outside the scope of the EIA) is part of the ongoing engagement.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1--138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its preconstruction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

23. AP 23 - Oak Farm Lodges

23.1 Person with Interest in Land (PIL) Reference ID: 14201, 14202

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to the proposed interference with our land because it would cause serious and long term harm to the operation and financial stability of our farm and holiday lodge business. The land identified is essential to how our business functions, and losing it would directly reduce our ability to farm effectively and damage the setting, appeal, and commercial performance of our holiday accommodation. This would result in a significant loss of income and restrict our ability to sustain or grow the business in the future. It is also not clear exactly what land they are looking to compulsory purchase and what it will be used for as there are multiple land areas and descriptions in the "Land Rights Tracker which can be found in the examination library of the Norwich to Tilbury website reference REP4-051" that do not appear to align to our previously discussed areas with National Grid. The proposal would also negatively affect the value and saleability of our property. Any reduction in land, amenity, or operational	Summary of Objection The Applicant understands that the AP's objection relates to the serious and long-term harm that would be caused to the operation and financial stability of the farm and holiday lodge business; concerns that land identified as subject to the Project's land rights is essential to how the business functions and that losing it would reduce the ability to farm effectively and damage the setting, appeal and commercial performance of the holiday accommodation; the potential negative effect on property value and saleability; the contention that alternatives have not yet been fully explored; and the AP's view that the harm is substantial, avoidable and disproportionate. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which the AP has an interest: (a) Class 5 (access) on plots B-1/13 and B-1/14. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP and their agents on 21 January 2026, at which concerns regarding the impact on the holiday lets business were discussed, as were potential mitigation measures during construction and compensation. Heads of Terms ("HoTs") negotiations are ongoing with the AP and their agent, including meetings to engage with the AP regarding practical matters associated with the Project. Version 2 of the HoTs was sent on 9 April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. An email was also sent to the AP's representative regarding crossing points.

Please summarise (in no more than 1500 words) the reason(s) for your objection

capacity makes the property less attractive to future buyers and reduces its market value, creating long term financial uncertainty for us. In addition, alternative avenues have not yet been explored, including the possibility of an access agreement or other forms of cooperation that would allow the project to proceed without removing or permanently interfering with our land. Any such arrangement would also need to include appropriate compensation for any losses or disruption caused. These options should be fully considered before any permanent acquisition or interference is pursued. Overall, the level of harm to our business, property, and livelihood is substantial, avoidable, and disproportionate. The impact on us is severe, and reasonable alternatives have not been properly examined.

Applicant's Response

Oak Farm Lodges is included in the assessment of potential impacts on built assets (which includes a range of types of facilities and assets such as visitor accommodation) located within a 3km study area of the Project. This assessment is presented in 6.15.CA1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area **[Revision B]**. For Oak Farm Lodges, the assessment concludes that there are likely to be minor adverse impacts on the accommodation during both the construction and operation phases, driven primarily by the likely visual impact experienced at this location. Disruption to access is not considered to be likely during the construction phase and a range of measures to contract potential construction impacts associated with the Project (for example noise) are set out in 7.2 Outline Code of Construction Practice **[Revision G]**. Impacts are not considered to be significant. Impacts on the visitor economy and visitor accommodation are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism **[Revision C]** which notes that there could be both direct and indirect economic effects on individual businesses as a result of the construction and operation of the Project including, for example, loss of business to visitor accommodation during construction. These matters are addressed outside of the Environmental Impact Assessment (EIA) process, through individual discussions with landowners, as specified here.

In relation to the permanent access right sought, this relates to access to pylon RG89 using the existing public highway access point and gap in hedge. The permanent access route will be used infrequently for inspections and maintenance activities only. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its preconstruction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

24. AP 24 - Paul Edmund Baker (also representing the Estate of E Hudson Baker and Mabel Anne Baker)

24.1 Person with Interest in Land (PIL) Reference ID: 3085, rep 5262 14920

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
No direct consultation after planned route changed to impacting our interests	Summary of Objection The Applicant understands that the AP's objection is that there was no direct consultation with this AP after the planned route changed so as to impact their interests. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds a subsoil interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP's representatives on 9 December 2025 to discuss practical matters associated with the Project, including severed areas and accommodation works. Version 2 of the Heads of Terms ("HoTs") was sent on 9 April 2026, which included an offer of a meeting to discuss the HoTs. A further meeting was held with the agent on 26 May 2026 to discuss reducing the grantor's land on the HoTs plans. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In response to the AP's specific concern regarding the lack of consultation following the route change, the Applicant confirms that the relevant change was consulted upon in the 2025 targeted consultations, under location reference: Suffolk 3. The consultation was held between 30 January 2025 and 3 March 2025, with full details available on the Project website (Document library, National Grid).

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

25. AP 25 - Alison Taylor (previously Alison Jane Davis)

25.1 Person with Interest in Land (PIL) Reference ID: 6078

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of this AP. No specific written reasons have been set out in the AP's representation. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project

Consolidated Response

The Applicant confirms that early statutory consultation engagement, including a section 42 notification pack, was undertaken with this AP in the summer of 2025, and that further engagement took place at the end of 2025. The Applicant remains committed to pursuing a voluntary agreement with this AP and to continuing engagement as the Project progresses.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily.

However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

26. AP 26 - David Robert Miles

26.1 Person with Interest in Land (PIL) Reference ID: 2692

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
For many years we have been involved with environmental schemes to enhance wildlife in the area that the pylons will be removed and built. We have seen substantial benefit from this, especially with small birds. This scheme will undo all the good that has been achieved over the years	Summary of Objection The AP has summarised their reasons for objection as follows: the AP objects to the proposed pylon route, arguing it will significantly harm the environmental, benefits that has been achieved through an Environmental Scheme. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP and their agent on 21 January 2026 to discuss Heads of Terms ("HoTs") and accommodation works. The main issues raised were the effects of the Project on the AP's shoot and mitigating losses to areas in environmental schemes. Version 2 of the HoTs was sent on 9 April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. An email regarding crossing points was sent to the agent on 26 June 2026. Where the Project affects land under an environmental scheme, the Applicant will seek to minimise disturbance during construction and provide compensation for losses to scheme payments where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

applicable. Engagement is ongoing with the AP and their representatives to understand the specific stewardship prescriptions in place.

In respect of the AP's concerns regarding the impact of the Project on the natural environment, ecology and wildlife, the Applicant confirms that the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met.

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the potential environmental impact of the Project. An Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The EIA is detailed within the Environmental Statement (ES) that was submitted as part of the application for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

27. AP 27 - Andrew Bendall

27.1 Person with Interest in Land (PIL) Reference ID: 1625, 7256

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The lane we use to access our property is used frequently and any loss of access is not acceptable. Disturbance by increased amount of traffic would adversely affect the quiet Location and also upset our dogs who are reactive to traffic on the lane.	Summary of Objection The Applicant understands that the AP's objection relates to the lane used frequently to access the AP's property, and concerns that any loss of access to this lane is not acceptable. The AP also raises concerns that increased levels of traffic on the lane would adversely affect the quiet character of the location and would disturb the AP's dogs, which are reactive to traffic on the lane. Land Rights Sought The AP is identified as a Category 2 interest on plot C-2/21 (class 3) and C-2/27 (class 7). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. Consolidated Response Although the Applicant has had no direct engagement with the AP to date and no land Rights are required from the AP, the Applicant would be happy to engage with the AP further to discuss their concerns. The Applicant wishes to address the AP's concerns regarding access directly. Access to the lane will remain unaffected by the Project. There are no Primary Access Routes

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

("PARs") located north or south of the AP's land parcels, only a crossover bellmouth on Burstall Lane to accommodate construction traffic associated with the undergrounding works for UKPN. Construction traffic is unable to access the haul road at crossover points from the public highway, unless captured within a specific circumstance detailed in **7.3 Outline Construction Traffic Management Plan [Revision E]**. Construction traffic access will be from Bullen Lane (Link PAR 21) or the A1071 (Link PAR 23) and will traverse along an associated haul road. The impact of traffic on these routes has been assessed as part of the **7.11 Transport Assessment [APP-333]** which indicate a low level of impact on traffic.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

28. AP 28 - Rachel Perry, James Perry

28.1 Person with Interest in Land (PIL) Reference ID: 7645, 7033

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Objection

The Applicant has noted the objection of Rachel Perry and James Perry. No specific reasons for objection have been set out in this AP's written representation

Land Rights Sought

The AP has Category 2 interest on parcels B-16/30 (Class 5 - access) and therefore no rights are being sought from the AP by the Applicant. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

29. AP 29 - Paul Whittle

29.1 Person with Interest in Land (PIL) Reference ID: 2599

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
National Grid have not responded to any of our concerns. Why should we help them if they continue to not listen?	Summary of Objection The Applicant understands that the AP's objection is that National Grid has not responded to his concerns, and queries why the AP should cooperate with the Project in the absence of such engagement. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure) and (b) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Consolidated Response The Applicant respectfully disagrees with the assertion that it has failed to engage with the AP's concerns. Following review of the AP's representations and the issues raised regarding subsoil rights beneath the highway, the Applicant reassessed its land requirements and concluded that rights over the AP's land are no longer required for National Grid's purposes. As a result, the AP's land has been removed from National Grid's voluntary acquisition programme and, on 8 June 2026, the Applicant wrote to the AP's representative confirming that the Draft Land Rights Tracker would be updated accordingly. The Applicant considers that this demonstrates that concerns raised during the Examination have been actively considered and have directly informed the Applicant's approach to land rights acquisition. The Applicant remains willing to engage further with the AP and their representative should any outstanding matters remain.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

30. AP 30 - Jonathan Cole-Matthews / John Cole Farms Limited

30.1 Person with Interest in Land (PIL) Reference ID: 10187

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
It is an infringement of our private property rights. Compensation would not reflect the international loss of valuable land	Summary of Objection The Applicant understands that the AP's objection relates to the infringement of their private property rights, and to the view that any compensation offered would not reflect the loss of valuable land. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP and their representatives on 27 January 2026, at which the main concerns raised were pylon siting and permanent access routes. These matters are currently being reviewed and discussions are ongoing to reach voluntary terms. Version 2 of the HoTs was sent on 9 April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative attended an

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. The Applicant remains committed to reaching a voluntary agreement with this AP.

The Applicant acknowledges the Affected Person's concerns regarding the impact of the Project on their property and their view that compensation would not adequately reflect the perceived loss. The Applicant notes that the powers of compulsory acquisition and the interference with private property rights associated with them are authorised only where there is a compelling case in the public interest and where the tests set out in the Planning Act 2008 and the relevant national policy have been satisfied. The extent of the land rights sought has been limited to those considered reasonably necessary for the construction, operation and maintenance of the Proposed Development.

The Applicant recognises that compensation cannot remove all personal concerns associated with the exercise of compulsory acquisition powers. However, affected persons are entitled to compensation in accordance with the statutory compensation code, which is intended to provide fair compensation for losses arising from the acquisition of land or rights and the effects of the Project on retained land.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added):

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

"Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

31. AP 31 - Victoria Owen

31.1 Person with Interest in Land (PIL) Reference ID: 561

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Please refer to my agent, E. Havers at Clarke and Simpson Ltd.	Summary of Objection The Applicant notes that the AP has referred to her agent in relation to her objection and has not set out any further specific details Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Restrictive Covenants, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP's representative. Version 2 of the HoTs was sent on 26 March 2026, which included an offer of a meeting to discuss the HoTs. The Applicant has met with the AP's agent on numerous occasions to progress the HoTs, most recently on 4 June 2026. Engagement continues between the AP's agent and the Applicant to reach voluntary terms. No AP-specific concerns have been raised to the Applicant's land agents during these meetings.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

32. AP 32 - William John Gray

32.1 Person with Interest in Land (PIL) Reference ID: 1115

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of William John Gray. No specific reasons for objection have been set out in the AP's written representation. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. Version 1 of the HoTs was issued in October 2025. Version 2 of the HoTs was issued in April 2026. No site meeting has been held following the issue of the HoTs, notwithstanding that multiple requests for a HoTs meeting have been made via the AP's agent, Rachel Hipperson, the last of which was made on 21 May 2026. The Applicant remains committed to meeting with the AP and their agent to progress HoTs discussions and reiterates its offer of a meeting. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

33. AP 33 - Sam Taylor

33.1 Person with Interest in Land (PIL) Reference ID: 10337

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The land in question is a former infilled quarry; our surface ownership is covered under EX834408. Holcim is referred to in the document as 'Lafarge International Holdings'. The former quarry was infilled with landfill and as such requires ongoing gas monitoring to comply with the EA landfill permit. To complicate matters, all access rights have been granted to 'Lafarge Aggregates Limited' (which is Tarmac) to infill, extract landfill gas and undertake any works necessary for landfill management under the EA permit. Therefore, we cannot agree to a unilateral arrangement or anything that will impede the rights granted to 'Lafarge Aggregates Limited' (Tarmac).	Summary of Objection The Applicant understands that the AP's objection relates to the fact that the land in question is a former infilled quarry, and as such requires ongoing gas monitoring. The Applicant notes and understand the AP feels they cannot agree to any unilateral arrangement or anything that would impede the rights granted to Lafarge Aggregates Limited (Tarmac). Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP. Version 1 of the HoTs was issued in October 2025. Version 2 of the HoTs was issued on 2 April 2026, which included an offer of a meeting to discuss the HoTs. No site meeting has been held following the issueof the HoTs. The Applicant acknowledges the AP's concerns regarding the existing rights granted to Lafarge Aggregates Limited (Tarmac) and confirms that it will engage with the AP and any relevant third parties to ensure that the rights sought by the Applicant do not impede any existing rights or obligations associated with the landfill permit. The Applicant remains committed to resolving these matters through ongoing dialogue. The Applicant Will liaise further with the AP to better understand the constraint, and request further details of the access rights granted to Lafarge Aggregates Limited (Tarmac), including the extent of the land affected, the nature

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and duration of the rights, and whether those rights would prevent or materially restrict the exercise of the powers and rights sought by the Applicant.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the potential environmental impact of the Project. An Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The EIA is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

[REP5-163]. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

34. AP 34 - Ian James Colchester

34.1 Person with Interest in Land (PIL) Reference ID: 3229

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of Ian James Colchester. No specific reasons for objection have been set out in the AP's written representation. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant confirms that statutory consultation engagement was undertaken with this AP in 2024 and 2025, and that meetings were held with agents in January and February 2026. The Applicant remains committed to progressing engagement with this AP and their representatives and to reaching a voluntary agreement wherever possible. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

35. AP 35 - Nemone Braithwaite

35.1 Person with Interest in Land (PIL) Reference ID: 4830

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The land is a nature reserve	Summary of Objection The Applicant understands that the AP's objection is that the land the subject of the proposed acquisition is a nature reserve. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. Regular meetings have been held with Brooks Leney, acting as the AP's representative, to discuss and negotiate the HoTs. Specifically, a meeting was held on 1 April 2026 to discuss the reissue of the HoTs and to continue with progression on specific points. A further meeting was held on 15 April 2026 to negotiate Version 2 of the HoTs, with National Grid in attendance. A subsequent meeting took place on 7 May 2026, again with National Grid present. The Applicant acknowledges that a temporary access route is required to conduct the 132kV works and the end of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

11kV works, and the Applicant is committed to minimising the impact of such works on the AP's land in the course of those operations.

The Applicant is aware that this area is near to a locally designated County Wildlife Site (CWS), known as Sproughton Park CWS. Potential impacts to this CWS have been included in the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and mitigation provided as necessary within the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

36. AP 36 - Brian James Floringer

36.1 Person with Interest in Land (PIL) Reference ID: 4865

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
All of our land is used for grazing by our horses and we cannot disrupt or reduce their food supply, or risk granting access	Summary of Objection The Applicant understands that the AP's objection relates to the use of all of the AP's land for grazing by horses, and the concern that the Project would disrupt or reduce the horses' food supply or risk granting access to that land. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project

Consolidated Response

In relation to the AP's concern regarding the use of the land for equestrian activities, the Applicant notes that, based on a review of available aerial imagery, street view and site photographs, the parcels referenced appear to be arable rather than equestrian in nature.

The Applicant is committed to minimising disruption to those operations throughout the life of the Project. The most suitable route for exercising the access right at any particular time would therefore be agreed with the AP at the time of access. This, together with the provision of information about access duration and nature of works, would help minimise disruption to the AP's farming and business operations.

The design of the Project meets the increased electromagnetic field ("EMF") requirements due to the road crossings at either side of the affected parcels. Accordingly, the design is compliant with relevant standards regardless of whether the land beneath the overhead line is used for equestrian activities.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added):

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

"Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

37. AP 37 - Martin Richard Mountfort

37.1 Person with Interest in Land (PIL) Reference ID: 3180

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
FP 105141-008 Seven Acre Field at Dunton (Sole Ownership) Also shown on your National Grid Drawing NG-NT-2025-06-GF-CON-R3-1481 N-T-LIQ-18833 OS Map Ref TQ 65 90 (part ownership with Justin Samuel Mountfort and Verity Collins) [REDACTED]. Presence of High Voltage Overhead Lines will devalue property. Construction work will damage Gateways and land surfaces(topsoil will be lost or mixed into deeper clay)	Summary of Objection The Applicant understands that the AP's objection relates to the presence of high voltage overhead lines will devalue the property, and that construction work will damage gateways and land surfaces, with particular concern that topsoil will be lost or mixed into deeper clay. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Occupation and Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP and their agent at the AP's property on 1 June 2026. A meeting was also held with the AP's agent on 20 April 2026 to negotiate Version 2 of the HoTs. The HoTs were issued on 21 April 2026 with an offer of a meeting to discuss them, though no response has been received to that offer. In relation to the AP's concern regarding property value, the Applicant acknowledges the concern but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

In relation to the AP's concern regarding damage to gateways and land surfaces, and the potential for construction activities associated with the Project to cause damage to agricultural and other land, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]**.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[APP-303]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure topsoil and subsoil resources do not become mixed and remain available and in the right condition to ensure the land can be returned to its preconstruction condition.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

38. AP 38 - Jonathan James Nelson

38.1 Person with Interest in Land (PIL) Reference ID: 9614

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This work will create a negative financial effect on house value, will cause disruption and environmental damage to where we live, and will cause inconvenience to our everyday lives and our ability to walk the surrounding area.	Summary of Objection The Applicant understands that the AP's objection relates to concerns that the Project will create a negative financial effect on house value, will cause disruption and environmental damage in the area where the AP lives, and will cause inconvenience to the AP's everyday life and ability to walk the surrounding area. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 5 (access). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project Consolidated Response In relation to the AP's concerns regarding property value, the Applicant acknowledges those concerns but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a

material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

An Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The EIA is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice **[Revision G]**, 7.3 Outline Construction Traffic Management Plan **[Revision F]**, 7.4 Outline Landscape and Ecological Management Plan **[Revision G]**, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation **[Revision C]** and 7.6 Outline Public Rights of Way Management Plan **[Revision D]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

39. AP 39 - Katherine Ann Nelson

39.1 Person with Interest in Land (PIL) Reference ID: 6668

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
this will cause severe inconvenience , have a negative effect on our house value, make it more difficult to be able to use the surrounding area for physical activity and for exercising dogs. It will scare away wildlife such as barn owls, bats and many more.	Summary of Objection The Applicant understands that the AP objects on the grounds that the Project will cause major disruption, reduce property values, impede recreational use of the area (including dog-walking and exercise), and have an adverse impact on wildlife (notably barn owls and bats). Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over plots B-12/8, B-12/25, B12-/28 and B-12/41 which this AP holds a Category 2 interest: (a) Class 5 (access). Consolidated Response Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. In relation to the AP's concerns regarding ecology and wildlife, the design process has taken account of existing biodiversity, the natural environment and, where practicable,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

In relation to the AP's concerns regarding physical activity and use of the surrounding area, as part of the Environmental Impact Assessment (EIA) process, an assessment has been completed on the potential impacts of the Project on health and wellbeing, with the findings presented in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]**. This includes an assessment of impacts as they relate to physical activity as a result of the potential for disruption to recreational routes or areas of open space. The assessment notes that the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of Public Rights of Way) are generally short-term, with rapid reversal or diversions in place. As such, impacts are considered to be negligible. Mitigation measures, management regimes and information relating to duration of impacts are described in **7.6 Outline Public Rights of Way Management Plan [Revision D]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the **4.1 Statement of Reasons (Issue B) [REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in **8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

The Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have raised concerns regarding the potential environmental impact of the Project. An Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The EIA is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

40. AP 40 - Andrew Donald Smith

40.1 Person with Interest in Land (PIL) Reference ID: 3398

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We have an agent working on our behalf to make an agreement with National Grid and UK Power Networks so that CA and TP should not be necessary.	Summary of Objection The Applicant understands that the AP's will continue to work with the applicant and UKPN to negate the need for Compulsory Acquisition and Temporary Possession. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant wishes to draw to the Examining Authority's attention the engagement that has taken place with this AP and their representatives. A meeting was held with the AP and their representatives on 23 January 2026 to discuss practical matters associated with the Project. Version 2 of the HoTs was issued on 9 April 2026, and dialogue has continued with the AP's agent since that time. The AP's representatives attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. The Applicant remains committed to reaching a voluntary agreement with this AP and continues to engage actively towards that end.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to the position of UK Power Networks, the Applicant confirms the following response from UKPN: UK Power Networks have had correspondence with Mr Smith's agent and intend to host a Teams meeting further to the design for the UK Power Networks works having been shared. UK Power Networks support the position that both parties are working to reach voluntary agreement on the land rights required, and further to a successful resolution compulsory acquisition will not be required.

The Applicant also refers, in response to the AP's assertion that CA and TP powers are not necessary, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. As the Statement of Reasons makes clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. In any event, the Applicant notes that, consistent with the AP's own position, both National Grid and UKPN are actively working to reach a voluntary agreement with the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

AP, and the Applicant is confident that the ongoing engagement underway with the AP's representatives reflects a genuine and committed effort to conclude terms without recourse to compulsory powers.

41. AP 41 - Claire Tebbutt

41.1 Person with Interest in Land (PIL) Reference ID: 13638

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Objection

The Applicant has noted the objection of Claire Tebbutt. No specific reasons for objection have been set out in the AP's written representation.

Land Rights Sought

The Applicant understands that this AP's objection concerns an Easement Right or Privilege held within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds a Category 2 interest (Class 1 – Compulsory Acquisition of Land), to acquire permanent rights for National Grid in respect of underground cable infrastructure (Class 3), and to exercise powers of temporary possession (Class 7) over land in which this AP holds an interest. No substantive specific reasons for objection were set out in the AP's submission. The AP holds an interest in plots D-4/29, D-4/30, D-4/31, D-4/32, D-4/32, D-4/33, D-4/35-38, D-4/43, D-4/44.

Consolidated Response

Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Due to the above no engagement has been required in regards to HoTs, and the Applicant confirms there are no outstanding site-specific matters to be addressed beyond the thematic points below. The Applicant remains committed to engaging with this AP to reach a voluntary agreement in respect of the land and rights required.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

42. AP 42 - KEVIN WILLIAM TEBBUTT

42.1 Person with Interest in Land (PIL) Reference ID: 13637

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of Kevin William Tebbutt. No specific reasons for objection have been set out in the AP's written representation Land Rights Sought The Applicant understands that this AP's objection concerns an Easement Right or Privilege held within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds a Category 2 interest (Class 1 – Compulsory Acquisition of Land), to acquire permanent rights for National Grid in respect of underground cable infrastructure (Class 3), and to exercise powers of temporary possession (Class 7) over land in which this AP holds an interest. No substantive specific reasons for objection were set out in the AP's submission. The APs holds an interest in plots D-4/29, D-4/30, D-4/31, D-4/32, D-4/32, D-4/33, D-4/35-38, D-4/43, D-4/44. Consolidated Response Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. Due to the above no engagement has been required in regards to HoTs, and the Applicant confirms there are no outstanding site-specific matters to be addressed beyond the thematic points below. The Applicant remains committed to engaging with this AP to reach a voluntary agreement in respect of the land and rights required.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

43. AP 43 - Juliet Francis

43.1 Person with Interest in Land (PIL) Reference ID: 14957

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The Applicant has noted the objection of Juliet Francis. No specific reasons for objection have been set out in the AP's written representation Land Rights Sought The Applicant understands that this AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, Easement Right or Privilege, and Restrictive Covenants. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire permanent rights for UK Power Networks ("UKPN") in the form of Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. No specific substantive reasons for objection were set out in the AP's submission. Consolidated Response The Applicant has been in active dialogue with the AP's agent regarding the terms on which the required rights will be acquired. Version 2 of the Heads of Terms ("HoTs") were issued to the AP's agent on 9 April 2026 and the Applicant has remained in dialogue with the AP's agent to negotiate those HoTs, with the aim of reaching a voluntary agreement. A meeting was held on 9 June 2026 to discuss accommodation works and to explore options to reduce the grantor's land take. The Applicant is aware of the concerns raised by the AP in connection with the sale of her land and is satisfied that responses have been provided on those matters. The AP's representatives also attended an Agent Group meeting with the Applicant on 4 June 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

44. AP 44 - Stephen March, Jane March and The Trustees of the Foljambe 1984 Settlement

44.1 Person with Interest in Land (PIL) Reference ID: 2550, 3717, 6103, 9438

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our objections to how this project would interfere with our land are twofold. There is the loss of use of the land and the impact on our business with a reduced acreage and the environmental damage that will be caused by the removal and stacking of soil for the haul roads and the trenching. The stacking of the topsoil will destroy the microbe and organic content of the soil as well as the drainage capability when returned to the field. As three parcels of land are permanent pasture, the effect will be greater as this will not return to what it is for many years. Especially the land in Fordham Valley where the land is ridge and furrow and provides Summer and Winter grazing. This land will lose its stock carrying capacity and productivity completely. The three areas of grassland will have a big impact on our competition horse breeding and beef rearing as we would have insufficient grass land to	Summary of Objection The AP objects on two principal grounds: the temporary loss of land and reduced acreage during construction will harm the AP's business', and the environmental damage from removal and stacking of soil for haul roads and trenching. Land Rights Sought The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds both Category 1 and Category 2 interests in the form of: Class 1 (Compulsory acquisition), Class 2 (overhead line) Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Certain parcels of land in which the APs hold an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). The APs have interests in plots D-4/10-13, D-4/21, D-4/23-25, D-4/28-46, D-4/52, D-4/54, D-4/59, D-4/62 D-4/64-66, D-4/72-73, D-4/75, D-4/77-78, D-4/80-81, D-4/83 D-4/85-86, D-4/93-97, D-4/101, D-5/1, D-5/3-5, Consolidated Response In terms of engagement with this AP, Version 2 of the Heads of Terms was sent on 26 March 2026, which included an offer of a meeting to discuss the terms. A HoTs meeting was subsequently arranged for and held on 20 April 2026, at which the AP and their representative were present. Commitments were taken away from that meeting for the Applicant to review, and responses have since been provided on a number of matters

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
graze the animals and conserve winter forage.	including the potential for reducing the grantor's land take. Large-scale plans were provided to the AP as requested. During route optioneering, the impacts on agricultural land, including on agricultural land-take and on agricultural activities and operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 – Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant seeks to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 – Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [AP-303]. provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e. for temporary haul routes) to its previous condition, or as agreed with the landowner. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its preconstruction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be sorted on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

topsoil). This will limited potential for subsoil or clay migration into topsoil resources. To confirm suitability of stockpiled soils for restoration, they will be inspected and assessments carried out before their reinstatement. Stockpiled soils shall be reconditioned as required. These measures, including the aftercare period, will ensure the soils have returned to their pre-construction condition.

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery.

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

45. AP 45 - Clive Bainbridge

45.1 Person with Interest in Land (PIL) Reference ID: 59

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Desecration old hedgerows and trees. Violation private land and loss of privacy.	Summary of Objection The AP objects to the desecration of old hedgerows and trees and to the violation of private land and loss of privacy arising from the Project. Land Rights Sought The Applicant understands that this AP holds Freehold and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid in the form of Class 3 (underground cable infrastructure), and permanent rights for UKPN in the form of Class 3 (underground cable infrastructure), over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. The AP has interest in plots D-7/68, D-7/71, D-7/75. Consolidated Response The Applicant confirms that it is not itself seeking rights directly from this AP in connection with the National Grid element of the Project at this stage. The rights being sought in relation to this AP's land refer to UKPN diversion works only, and UKPN's appointed agent has been engaging with the AP separately in order to negotiate terms in respect of those works. The Applicant remains open to discussing any queries the AP may have in connection with the Project. In relation to the AP's concerns regarding the impact on hedgerows and trees, the Applicant confirms that the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [Revision C] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. For example, trees and hedgerows that are removed by the Project will be replaced with new planting. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code fore.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology an hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

46. AP 46 - Ellena Benton

46.1 Person with Interest in Land (PIL) Reference ID: 29427

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Object	Summary of Objection The AP has registered an objection of “object” to the Project. Land Rights Sought The Applicant understands that this AP holds a Freehold interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. The AP has an interest in plots H-4/35, H-4/37, H-4/44-47, H-4/49, H-4/51, H-4/53-56, H-4/59. Consolidated Response The Applicant has been actively engaging with this AP's agent. A meeting was held on 20 April 2026 to negotiate the Version 2 Heads of Terms, attended by the Applicant's land team. The HoT document was sent to the AP's agent on 21 April 2026 with an offer of a further meeting to discuss the terms. On 28 May 2026, a meeting was held with the landowner to discuss the potential for a data centre on the land and the interaction of any such development with the Red Line Boundary. The AP subsequently provided plans for the proposed development so that this could be assessed by the Applicant. The Applicant is

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

currently reviewing those plans and remains committed to continued engagement with the AP on this matter with a view to finding a suitable solution.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project. ”

47. AP 47 - Laura Lennox

47.1 Person with Interest in Land (PIL) Reference ID: 777

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Heads of Terms are not satisfactory and NG / UK Power Networks are not engaging with the relevant bodies /land agents in a constructive manner to resolve landowner issues.	Summary of Objection The AP's objection is that the Heads of Terms are not satisfactory and that National Grid and UK Power Networks are not engaging with the relevant bodies and land agents in a constructive manner to resolve landowner issues. Land Rights Sought The Applicant understands that this AP holds Freehold, Leasehold, and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of Class 2 (overhead line infrastructure), and powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8, meaning no powers of compulsory acquisition or temporary possession are sought in respect of those parcels. Consolidated Response In terms of the Applicant's engagement with this AP, a meeting was held with the AP's agents on 20 April 2026 to negotiate the Version 2 Heads of Terms, with the Applicant's land team in attendance. The Version 2 HoT document was sent to the AP's agent on 21 April 2026 with an offer of a further meeting to discuss the terms. No response to that offer has been received to date. The Applicant remains open to discussions over the Heads of Terms and committed to reaching a voluntary agreement. In relation to the land parcels relating to the affected party, UK Power Networks have been seeking to engage with the freehold (Category 1) affected party (Flying Trade Group Plc). An initial response was received from Flying Trade Group Plc on 5 June 2026; however, UK Power Networks continue to seek further engagement with the affected party. UK Power Networks have yet to issue HoTs in relation to these parcels in line with the UK Power

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Networks land strategy to seek meaningful engagement and issue specific HoTs to each affected party.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

48. AP 48 - Stuart Paris

48.1 Person with Interest in Land (PIL) Reference ID: 7304

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Heads of Terms are not satisfactory and NG / UK Power Networks are not engaging with the relevant bodies /land agents in a constructive manner to resolve landowner issues.	Summary of Objection The AP's objection mirrors that of AP 47 in that the Heads of Terms are said not to be satisfactory and that National Grid and UK Power Networks are not engaging with the relevant bodies and land agents in a constructive manner to resolve landowner issues. Land Rights Sought The Applicant understands that this AP holds a Freehold interest within the Project Order Limits. Certain parcels of land in which the AP holds an interest fall within Class 8, meaning no powers of compulsory acquisition or temporary possession are sought in respect of those parcels. Consolidated Response In terms of the Applicant's engagement with this AP, a meeting was held with the AP's agents on 20 April 2026 to negotiate the Version 2 Heads of Terms, with the Applicant's land team in attendance. The Version 2 HoT document was sent to the AP's agent on 21 April 2026 with an offer of a further meeting to discuss the terms. No response to that offer has been received to date. The Applicant remains open to discussions over the Heads of Terms and committed to reaching a voluntary agreement. In relation to the land parcels relating to the affected party, UK Power Networks have been seeking to engage with the freehold (Category 1) affected party (Flying Trade Group Plc). An initial response was received from Flying Trade Group Plc on 5 June 2026; however, UK Power Networks continue to seek further engagement with the affected party. UK Power Networks have yet to issue HoTs in relation to these parcels in line with the UK Power Networks land strategy to seek meaningful engagement and issue specific HoTs to each affected party.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

49. AP 49 - Brian John Faulkner

49.1 Person with Interest in Land (PIL) Reference ID: 9339

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Pylon TB180 at Handley Green The proposed pylon TB180 will be alongside the access road from Handley Green to our property which is the only property on this road. It is a cul-de-sac, an unmade dirt road and is our only access in and out of our property. We therefore need access 24/7. We object to any change which affects our access. If National Grid or UKPN are to use this track they must ensure our access is freely available during any construction and maintenance work. The road into Handley Green and the dirt road to Marshalls Farm and Annexe are single track and unsuitable for large and/or heavy vehicles and National Grid will need to resurface and maintain the roads.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to any change in use of the access road to their property from Handley Green, to enable construction of Pylon TB180, or enabling works by UKPN. The AP further raises concern on the functionality of the road into Handley Green and the dirt road to Marshalls Farm and Annexe, which National Grid will need to resurface and maintain the roads. Land Rights Sought The Applicant understands that this AP holds Occupation and Easement Right or Privilege interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of Class 2 (overhead line infrastructure) and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire permanent rights for UKPN in the form of Class 4 (overhead line and underground cable infrastructure). The AP has not received HOTs as The Applicant is seeking these from the Category 1 Freeholder. Consolidated Response The Applicant wishes to clarify for this AP that the pylon located near Handley Green and Marshalls Farm is pylon TB182 and not TB180 as referenced in the AP's submission. In terms of the road and dirt track that the AP is concerned about, the Applicant can confirm that these are intended to be used only as either a crossover bellmouth location for the construction haul road, or as a permanent maintenance access point. The road itself will not be used as a Primary Access Route throughout construction, following the construction

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

access strategy in **7.3 Outline Construction Traffic Management Plan [Revision F]**. Access to the residential property will be maintained throughout the construction and operational phase, as secured through Article 16(3) of **3.1 draft Development Consent Order [Revision F]**. The permanent right of access that is sought will be used only infrequently, for inspections and maintenance activities. Such access will necessitate only light vehicles; accordingly, the AP's concern regarding large and/or heavy goods vehicles does not arise. The most suitable route of access on each occasion would be agreed between the Applicant and the AP at the time the access is required.

UK Power Networks are undertaking steps to engage the landowner directly based on details provided in the Book of Reference, due to the land being unregistered. The affected party's concerns regarding access are noted, and UK Power Networks will work to ensure that access is maintained to their property at all times during any works undertaken.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

50. AP 50 - Usha Faulkner (nee Rao)

50.1 Person with Interest in Land (PIL) Reference ID: 7661

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Pylon TB180 at Handley Green The proposed pylon TB180 will be alongside the access road from Handley Green to our property which is the only property on this road. It is a cul-de-sac, an unmade dirt road and is our only access in and out of our property. We therefore need access 24/7. We object to any change which affects our access. If National Grid or UKPN are to use this track they must ensure our access is freely available during any construction and maintenance work. The road into Handley Green and the dirt road to Marshalls Farm and Annexe are single track and unsuitable for large and/or heavy vehicles and National Grid will need to resurface and maintain the roads.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to any change in use of the access road to their property from Handley Green, to enable construction of Pylon TB180, or enabling works by UKPN. The AP further raises concern on the functionality of the road into Handley Green and the dirt road to Marshalls Farm and Annexe, which National Grid will need to resurface and maintain the roads. Land Rights Sought The Applicant understands that this AP holds Occupation and Easement Right or Privilege interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of Class 2 (overhead line infrastructure) and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire permanent rights for UKPN in the form of Class 4 (overhead line and underground cable infrastructure). The AP has not received HOTs as The Applicant is seeking these from the Category 1 Freeholder. Consolidated Response The Applicant wishes to clarify for this AP that the pylon located near Handley Green and Marshalls Farm is pylon TB182 and not TB180 as referenced in the AP's submission. The road and dirt track are intended to be used only as either a crossover bellmouth location for the construction haul road, or as a permanent maintenance access point. The road itself will not be used as a Primary Access Route throughout construction, following the construction access strategy in 7.3 Outline Construction Traffic Management Plan [Revision F].

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Access to the residential property will be maintained throughout the construction and operational phase, as secured through Article 16(3) of **3.1 draft Development Consent Order [Revision F]**. Any permanent right of access will be used only infrequently for inspections and maintenance activities, and will necessitate only light vehicles; accordingly, the AP's concern regarding large and/or heavy goods vehicles does not arise. The most suitable route of access on each occasion would be agreed between the Applicant and the AP at the time the access is required.

UK Power Networks are undertaking steps to engage the landowner directly based on details provided in the Book of Reference, due to the land being unregistered. The affected party's concerns regarding access are noted, and UK Power Networks will work to ensure that access is maintained to their property at all times during any works undertaken.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

51. AP 51 - Elizabeth Xenakis

51.1 Person with Interest in Land (PIL) Reference ID: 7345

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Ruin the countryside	Summary of Objection The AP has summarised their reasons for objection as follows: The Project will ruin the countryside. Land Rights Sought The Applicant understands that this AP holds Freehold and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire permanent rights for UKPN in the form of Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Consolidated Response The Applicant has been in active dialogue with this AP's agent. Version 2 of the Heads of Terms was sent on 26 March 2026 and the Applicant has maintained ongoing engagement with the AP's agent, the most recent occasion being 4 June 2026. The Applicant remains committed to reaching voluntary terms with this AP in respect of the land and rights required. The Applicant has sought to reduce, as far as practicable, potential impacts on visual receptors, through routeing and siting of infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant effects on landscape character and visual amenity as reported in the Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology an hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

52. AP 52 - Stephen Paul Goulding

52.1 Person with Interest in Land (PIL) Reference ID: 3931

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed interference with my land and private rights arising from the Development Consent Order. My land is approximately two acres of pasture forming part of my home known as [REDACTED]. The land is not a detached commercial holding; it forms part of the setting, amenity, enjoyment and ordinary use of my home. My objection is focused on the interference with my land and rights, including access during development, the impact of construction and operational works in close proximity to my property, the loss of the countryside setting visible from and enjoyed as part of my home, and potential interference with utilities and internet services on which I rely, including for working from home. I do not consent to the compulsory acquisition, temporary possession, acquisition of rights, creation of new rights, extinguishment, suspension, overriding or interference with any rights affecting my land unless the Applicant can demonstrate that the strict statutory tests are met.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's land comprises approximately two acres of pasture forming part of his home and its setting. The objection is focused on the interference with the AP's land and rights, including: access to the property during the development phase; the impact of construction and operational works in close proximity to the property; the loss of the countryside setting visible from and enjoyed as part of the home; and potential interference with utilities and internet services on which the AP relies, including for working from home. The AP challenges whether the Section 122 test is met, submitting that the Applicant has not demonstrated that interference with his land or rights is "required" within the meaning of that section, and that less intrusive alternatives have not been fully explored. The AP also raises concerns regarding access for construction traffic, temporary works, and road closures, and maintains that the Applicant has not provided sufficient certainty that access will be maintained at all times. The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria. Land Rights Sought The Applicant understands that this AP holds an Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid

Please summarise (in no more than 1500 words) the reason(s) for your objection

Section 122 of the Planning Act 2008 requires the Secretary of State to be satisfied that the land or rights are required for the development, are required to facilitate or are incidental to it, or are replacement land, and that there is a compelling case in the public interest. That is a demanding test. It is not enough for the Applicant to show that interference with my land or rights would be convenient, cheaper, administratively easier, or preferable from the Applicant's point of view. The Applicant must show that the interference is necessary, proportionate and no more than is reasonably required.

I object because the Applicant has not demonstrated that interference with my land or rights is "required" within the meaning of section 122. My land is pasture forming part of a residential property and its setting. Any interference with access, services, occupation, quiet enjoyment, existing rights, amenity or use of that land would be a serious private burden. The Applicant must explain precisely what powers are sought over or affecting my land, why those powers are necessary, why less intrusive alternatives are not available, and why the same outcome cannot be achieved by design changes, routing changes, construction controls, protective provisions, voluntary agreement, or other mitigation.

Applicant's Response

over land in which this AP holds a Category 2 interest in the form of: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest.

Consolidated Response

Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project. The Applicant notes that this AP's property is situated approximately 200 metres from the closest point of the Red Line Boundary. The Applicant confirms that there has been no active direct engagement with this party as no rights are being sought directly from the AP in respect of the National Grid element of the Project.

The Applicant does not envisage that the exercise of the rights sought for the Project would interfere with, extinguish or otherwise adversely affect this AP's existing easement rights or privileges, and no direct acquisition of rights from this AP is proposed. Should any impact on those rights arise as the detailed design develops, the Applicant would engage with the affected party and any entitlement to compensation would be considered in accordance with the statutory compensation code.

In relation to the AP's concerns regarding access, with the exception of Great Tey Road, all other local highways and access tracks within the APs interest are intended to be used only as either a crossover bellmouth location for the construction haul road, or as a permanent maintenance access point. Only Great Tey Road will be used as a Primary Access Route

Please summarise (in no more than 1500 words) the reason(s) for your objection

The Department for Communities and Local Government guidance, Planning Act 2008: Guidance related to procedures for compulsory acquisition, September 2013, makes clear that compulsory acquisition powers should only be sought where there is a compelling case in the public interest, and that applicants should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. I do not consider that this has been demonstrated in relation to my land. In particular, the Applicant has not shown that the impacts on my access, residential enjoyment, pasture use, services and property setting have been avoided or reduced to the minimum necessary.

Access is a particular concern. [REDACTED] and its associated pasture require safe, practical and reliable access. Any construction traffic, temporary works, road closures, diversions, obstruction, narrowing, mud, noise, vibration, or restricted access could interfere with my ability to use and enjoy my property and land. These are not minor inconveniences. They affect the ordinary occupation of my home, the use and management of the pasture, visitors, deliveries, emergency access, and the general ability to live and work from the property. The Applicant has not provided sufficient certainty that access will be maintained at all times, or that any

Applicant's Response

throughout construction, following the construction access strategy in **7.3 Outline Construction Traffic Management Plan [Revision F]**. Great Tey Road is referred to as Link PAR 39, and has been assessed for impact in **7.11 Transport Assessment [APP-333]**. The peak construction traffic is expected to have a duration of approximately 3 weeks, with an addition 6 LGVs and 14 HGVs in both the AM and PM Peak (details included in **7.11 Transport Assessment Appendix E: LRN AM and PM Peak Construction Traffic Committed Developments Impacts [APP-338]**. Access to the residential property will be maintained throughout the construction and operational phase, as secured through Article 16(3) of **3.1 draft Development Consent Order [Revision F]**. Any permanent right of access over this land would be used only infrequently for inspections and maintenance activities and will necessitate only light vehicles. The most suitable route of access on each occasion would be agreed between the Applicant and the AP at the time the access is required.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
interference will be avoided, minimised, strictly controlled and enforceable. I also object because of the potential impact on utilities and internet services. I work from home and reliable internet and utility connections are essential to the ordinary use of my property. Any interruption, damage, diversi [COMMENT TRUNCATED AT THIS POINT]	to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[REP3-034]** and would present no issues with for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions.

53. AP 53 - Stephen Roger Hart

53.1 Person with Interest in Land (PIL) Reference ID: 5305

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
As I have attempted to comply with all reasonable requests for access, intrusive and non intrusive surveys and other questions I don't feel there is a need under section 122 to acquire any of the rights over the land. For section 123, I will have a permanent land impairment that will impact my ability to farm, develop or enjoy rightful use and enjoyment of the entire land holding. The holding was purchased in 2019 for £400,000 and considerable input costs have been incurred to bring the holding into productive use. The current stated single payment is derisory in comparison to the productivity and amenity lost.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP states that he has complied with all requests for access and surveys, and submits that on this basis, the Section 122 test has not been satisfied as the acquisition of his land by compulsory means is not necessary. The AP further objects on the basis that permanent impairment of his farmland will severely affect his farming operation and that the payment offered is derisory in comparison to the productivity and amenity lost. Land Rights Sought The Applicant understands that this AP holds Freehold, Occupation, and Easement Right or Privilege interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of Class 2 (overhead line infrastructure) and Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Consolidated Response The Applicant has engaged with this AP on a number of occasions. A meeting was held on 20 January 2026 at which a range of accommodation works matters were discussed, including: soil stripping and storage; severed land; drainage; crossing points; haul roads; and the potential for solar development on the AP's land. The solar option continues to be explored through the Statement of Common Ground process. A further meeting took place on 20 April 2026 to discuss the Version 2 Heads of Terms, and the Version 2 HoT document was subsequently sent to the AP's agent on 21 April 2026. The Applicant has made requests for a further meeting to continue discussions and remains committed to reaching a voluntary agreement with this AP in respect of the land and rights required.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

54. AP 54 - Heather Jane English

54.1 Person with Interest in Land (PIL) Reference ID: 37

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
A-1/23 NK67663 Following 2 on-site consultations alternative re-routing plans from the west of my front entrance and then to the south along the field boundary west of The Vale up to Church Road were acknowledged. Subsequently no up-dated plans have been received. The original plan still appears to be in place.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP states that two on-site consultations took place with a number of alternative re-routing plans acknowledged by the National Grid representatives as viable. The AP assumes that the original plan remains in place as they have not received updated plans from National Grid. Land Rights Sought The Applicant understands that this AP holds Freehold and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Consolidated Response The Applicant notes that it is not itself seeking rights directly from this AP in connection with the National Grid element of the Project. The rights being sought in relation to this AP's land are in connection with UKPN works, and UKPN are actively engaging with all affected persons to secure rights to undertake works required on their own network. The Applicant understands that UKPN's engagement with this AP in respect of those works is ongoing. The Applicant remains open to discussing any queries the AP may have in connection with the Project generally and will liaise with UKPN regarding the proposed rerouting.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

55. AP 55 - Coryn Gladys Hart

55.1 Person with Interest in Land (PIL) Reference ID: 15231

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
For section 123. The land is not strictly required as it is over 1mile away from the proposed works. It is not on any direct or indirect access routes and has had no infrastructure or access requests made upon it.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects on the basis that their land is over one mile away from any construction works, does not appear to be on any access route, and that no request to install any infrastructure on or under the land has been received. Land Rights Sought The Applicant understands that this AP holds an Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds a Category 2 interest in the form of Class 2 (overhead line infrastructure). The AP's land is directly affected by the overhead line infrastructure forming part of the Project. The AP has an interest in plot G-3/6. Consolidated Response A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") an temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance").

In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

56. AP 56 - Great Cowbridge Grange Farm Ltd

56.1 Person with Interest in Land (PIL) Reference ID: 10359

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Section 122. There is no need to gain additional access to the proposed sites other than via the access road for the Southern Water sewerage treatment works. Section 123. The potential loss to Great Cowbridge Grange Farm Ltd. is of an agreed option with Conrad Energy (Developments) Ltd. and respective planning permission to build a solar farm on or adjacent to the land in question. The agreement is for a 40 year lease to Conrad Energy of the land unencumbered (As per clause 9 of the option). If the planned works impact or cause the option agreement not to be exercised there will be a loss of 40 years worth of rent and generation income to Great Cowbridge Grange Farm Ltd.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP sets out two grounds of objection. First, pursuant to Section 122, the AP submits that there is no need for any additional access to the AP's land beyond the existing Southern Water access road, which the AP asserts would be sufficient for National Grid's purposes. Second, pursuant to Section 123, the AP submits that the Project could result in the loss of a potential 40-year solar farm option that the AP has with Conrad Energy, which the AP submits represents a substantial private loss that is not adequately addressed. Land Rights Sought The Applicant understands that this AP holds Freehold and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant does not agree that there is no need for the access rights sought. The rights have been identified as necessary to facilitate the construction, operation and maintenance requirements of the Project. The Applicant notes the AP's suggestion that access could be obtained solely via the Southern Water sewage treatment works access road. The Applicant has considered access requirements as part of the Project design process and continues to review detailed access arrangements through ongoing design development and engagement with affected parties. The Applicant remains willing to discuss alternative access arrangements where these are practicable and compatible with the safe and efficient delivery, operation and maintenance of the Project.

In relation to the AP's concern regarding the option agreement with Conrad Energy (Developments) Ltd and the potential future solar farm development, the Applicant acknowledges the existence of ongoing discussions with Conrad regarding the interaction between the Project and the proposed solar farm. As recorded in the Statement of Common Ground, discussions are ongoing and the finalisation of proposals will be confirmed following detailed design development. The extent of any temporary haul road access and any additional maintenance access requirements remain subject to detailed design and continued engagement with Conrad Energy. Any such access arrangements would need to remain within the Order Limits. The Applicant therefore does not agree that it has been demonstrated that the Project would prevent the exercise of the option agreement or give rise to the loss alleged by the AP. The Applicant will continue to engage with Conrad Energy and affected landowners to seek to minimise interactions between the respective projects and to identify appropriate mitigation where required.

To the extent that any legally compensable loss is incurred as a result of the exercise of powers under the Order, entitlement to compensation would be assessed in accordance with the statutory Compensation Code.

The Applicant has been in active engagement with this AP on a number of occasions. Meetings took place on 12 September 2025 and 3 February 2026, and a further meeting has been arranged for 7 July 2026. Discussions have covered the pulling areas associated with pylons TB203 and TB204, the potential impact on the AP's solar panels, the haul road design, and sustainable urban drainage (SUDs) matters within the photovoltaic area. In relation to pylon TB203, the Applicant can confirm that the pulling areas will most likely not be required under the current design, which would reduce impact on the solar panels

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

associated with that pylon. The pulling areas and haul road associated with TB204 remain under design and are within the photovoltaic area; the Applicant is working to minimise the footprint of those works in this location. In relation to pylon TB204, the Applicant's position is that the pylon itself cannot be relocated, but the Applicant maintains that both the Project and the proposed solar scheme can co-exist without the solar scheme being prevented from proceeding.

In relation to the siting of pylons TB203 and TB204, the Applicant confirms that these have been positioned to reduce the impact on the AP's land as far as practicable. Alternative overhead line alignments to the west of pylon TB204's current position were considered but were assessed as less preferable due to the effects that would arise in relation to a Grade I listed church, areas of ancient woodland, and the need to oversail third-party infrastructure in that location. The Applicant therefore made no change to the location of those pylons following consideration of the representations made.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery.

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

57. AP 57 - Richard John Allan

57.1 Person with Interest in Land (PIL) Reference ID: 6498

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Objection Summary: Interference with My Land/Rights via Compulsory Acquisition To the Secretary of State for National Infrastructure re: Norwich to Tilbury Project Development Consent Order I, Richard John Allan, owner of [REDACTED], object to the proposed compulsory acquisition of my land / rights over my land / temporary possession of my land EX835923, EX835920 in the draft DCO. Section 122 of the Planning Act 2008 A DCO may include provision authorising compulsory acquisition of land only if the Secretary of State is satisfied that: (a) the land is required for the development (or to facilitate or be incidental to it, or is replacement land); and (b) there is a compelling case in the public interest for the compulsory acquisition. 1. The land is not shown to be required (s.122(2)) The applicant has not demonstrated that my specific land/plots are required, or that the extent of interference (full acquisition / rights / temporary	Summary of Objection The AP has summarised their reasons for objection as follows: The AP submits that the Section 122 statutory test has not been met, contending that the Applicant has not demonstrated a compelling case in the public interest for the compulsory acquisition of the AP's land, with reasonable alternatives not adequately explored. The AP notes the permanent and irreversible loss of agricultural land, severance of the farm holding, loss of vehicular access, and the overall financial impact on their farming livelihood. The AP challenges whether the Section 123 procedural condition has been properly satisfied and asserts that the Applicant has failed to comply with the applicable guidance in the DCLG/MHCLG 2013 document in relation to pre-application engagement and evidence of the reasonable necessity of the acquisition. Land Rights Sought The Applicant understands that this AP holds Freehold, Occupation, and Easement Right or Privilege interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Consolidated Response The Applicant does not agree that the land and rights sought are unnecessary. The extent of the land and rights included within the Order has been informed by the Project's design requirements and has been limited to those considered reasonably necessary for the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
possession) is no more than reasonably necessary. Viable alternatives exist but have not been presented in a fully costed way for fair comparison. The DCLG Guidance (September 2013) states at paragraph 8 that applicants must show all reasonable alternatives to compulsory acquisition (including scheme modifications) have been explored, and that the proposed interference is necessary and proportionate. This test is not met. The interference with my rights is not justified as the minimum required. 2. No compelling case in the public interest (s.122(3)) There is no compelling evidence that the public benefits of acquiring/interfering with my land outweigh the significant private loss I would suffer. The private loss includes permanent loss of farmland my severance of my remaining land; loss of access; disruption to my livelihood/quiet enjoyment; and financial impacts. These effects engage my rights under Article 1 of the First Protocol (peaceful enjoyment of possessions) and, where relevant, Article 8 ECHR. The Guidance (paragraphs 10, 13–16) requires the Secretary of State to balance public benefit against private loss and to be satisfied that the interference is legitimate, necessary, and proportionate. Parliament's view (Guidance para 13) is that land should	construction, operation and maintenance of the Proposed Development. The Applicant has considered alternatives throughout the design process and has sought to minimise impacts on affected landowners where reasonably practicable. The Applicant considers that the land and rights sought over the Affected Person's land are required for the Proposed Development and that the requirements of section 122 of the Planning Act 2008 have been satisfied. The Applicant has engaged with this AP's agent on multiple occasions. Version 1 of the Heads of Terms was issued to the AP's agent in October 2025, and Version 2 was issued in April 2026. Requests for a meeting have been made on multiple occasions through the AP's agent, most recently on 18 May 2026. The Applicant remains open to meeting with the AP and their representative to discuss the Heads of Terms and the AP's specific concerns, and reiterates that offer of a meeting in this response. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
only be taken compulsorily where there is clear evidence that public benefit outweighs private loss. The applicant has not provided this in relation to my land. The interference fails the test. Section 123 of the Planning Act 2008 A DCO may authorise compulsory acquisition only if one of the conditions in s.123(2)–(4) is met (e.g., the application included a request for CA of the land and proper procedures were followed, or all interested parties consent). I do not consent. I question whether the procedures were adequately followed in respect of my land. The Guidance emphasises seeking acquisition by agreement wherever practicable (paragraphs 21–26 on pre-application consultation and engagement). This has not been achieved. Further relevant Guidance points • Para 8: Failure to explore all reasonable alternatives and lack of proportionality. • Para 9: Inadequate demonstration of a reasonable prospect that funds will be available for the acquisition and related works. The Funding Statement does not sufficiently address my land. • Para 10: The proposal does not adequately justify the interference with my human rights.	The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Conclusion The statutory tests in sections 122 and 123 of the Planning Act 2008 are not satisfied in respect of my land/rights. The Secretary of State should refuse to authorise the compulsory acquisition or other interference with my interests, or modify the DCO to exclude or minimise it. I remain willing to negotiate a voluntary agreement on fair terms but oppose the use of compulsory powers.

Applicant's Response

property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

58. AP 58 - Dominic William Petre

58.1 Person with Interest in Land (PIL) Reference ID: 1004

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are trying to engage in the granular planning process and accept that the project need to be done in general so there is no need for compulsory powers	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the Applicant's intention to seek compulsory acquisition powers in respect of their land, given their willingness to engage voluntarily. Land Rights Sought The Applicant understands that this AP holds Freehold and Occupation interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN over land in which this AP holds an interest. Consolidated Response The Applicant welcomes the AP's constructive engagement with the Project and acknowledges the AP's stated willingness to proceed on a voluntary basis. The Applicant has engaged with this AP on several occasions. A meeting was held on 10 March 2026 to discuss accommodation works matters including crossing points, severed areas, soils management and drainage. A further meeting was held with the AP's agents on 20 April 2026 to discuss Heads of Terms wording and related matters. Version 2 of the Heads of Terms was sent to the AP's agent on 21 April 2026, and the Applicant is seeking a further meeting to continue discussions with a view to finalising voluntary terms as soon as possible.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

59. AP 59 - Lord Petre (W H Norris and Sons)

59.1 Person with Interest in Land (PIL) Reference ID: 1406

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are trying to engage with the granular planning process. While there is no objection for the overall need of the project there are many fine details that need agreement but there is no need for compulsory powers	Summary of Objection The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure) (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

The Applicant understands that this AP holds Freehold, Occupation, and Restrictive Covenant interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8, meaning no powers of compulsory acquisition or temporary possession are sought in respect of those parcels at this stage.

The Applicant has engaged with this AP's agent on a number of occasions. A meeting was held on 10 March 2026 to discuss accommodation works matters including crossing points, severed areas, soils management and drainage. A further meeting was held with the AP's agents on 20 April 2026. Version 2 of the Heads of Terms was sent to the AP's agent on 21 April 2026, and the Applicant is seeking to arrange a further meeting to continue discussions and progress matters towards voluntary agreement.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

60. AP 60 - Lord Petre

60.1 Person with Interest in Land (PIL) Reference ID: 1406

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are engaging with the granular planning process. While we accept the overall nature of the project there are many details that still need addressing. However compulsory powers are un needed	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the Applicant's intention to seek compulsory acquisition powers in respect of their land, given their willingness to engage, but noting that many details still need to be addressed. Land Rights Sought The Applicant understands that this AP holds Freehold, Occupation, and Restrictive Covenant interests within the Project Order Limits. The Applicant is seeking to acquire permanent rights for National Grid over land in which this AP holds an interest in the form of: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking permanent rights for UKPN in the form of Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8, meaning no powers of compulsory acquisition or temporary possession are sought in respect of those parcels at this stage. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant welcomes the AP's acknowledgement of the overall need for the Project and its engagement with the planning process. The Applicant has engaged with this AP's agent on a number of occasions. A meeting was held on 10 March 2026 to discuss accommodation works matters including crossing points, severed areas, soils management and drainage. A further meeting was held with the AP's agents on 20 April 2026. Version 2 of the Heads of Terms was sent to the AP's agent on 21 April 2026, and the Applicant is seeking to arrange a further meeting to progress those discussions. The Applicant reiterates that its strong preference is to reach voluntary agreement with this AP and will continue to engage actively to achieve that aim. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

61. AP 61 - Peter Albert Kelly

61.1 Person with Interest in Land (PIL) Reference ID: 24590

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Any land taken from me would have a detrimental affect on the property value and marketability if I wished to move in the future.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP is concerned by the potential detrimental effect that any land taken for use by the project would have on their property value and marketability. Land Rights Sought The Applicant understands that this Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Consolidated Response

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

62. AP 62 - Geoffrey Norman William Stevens

62.1 Person with Interest in Land (PIL) Reference ID: 2997

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I have completed this form in the way I have as the proposed discussion with National Grid and UK Power Networks has not yet taken place about the works involved and how it affects my property.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is raised on the basis that the proposed discussion with National Grid and UK Power Networks has not yet taken place about the works involved and how they affect his property. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant can confirm that engagement has taken place with the AP's representative, Brooks Leney. The Applicant's land agent (Fisher German) has met with Brooks Leney multiple times to negotiate and progress the Heads of Terms ("HoTs"), most recently at a meeting held on 15 June 2026. Revised Terms will be issued in due course and the Applicant continues to engage with the AP's agent. In addition, the AP's representatives attended an Agent's Group meeting with Fisher German and National Grid on 4 June 2026. No specific concerns have been identified by the AP's agent during these meetings.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to UK Power Networks' works, UK Power Networks held a meeting with the affected party's identified land agent (Brooks Leney) on 18th June 2026. UK Power Networks have proposed a site visit to discuss the proposals with the affected party and their agent, after which specific HOTs will be issued to the affected party/their land agent for review. UK Power Networks intend to continue to work with the landowner and their agent to seek to achieve the rights required voluntarily.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate.

The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

63. AP 63 - Ann Ruth Stevens

63.1 Person with Interest in Land (PIL) Reference ID: 8159

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I have completed this form in the way I have as the proposed discussion with National Grid and UK Power networks has not yet taken place about the works involved and how it affects my property.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is raised on the basis that the proposed discussion with National Grid and UK Power Networks has not yet taken place about the works involved and how they affect his property. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant can confirm that engagement has taken place with the AP's representative, Brooks Leney. The Applicant's land agent (Fisher German) has met with Brooks Leney multiple times to negotiate and progress the HoTs, most recently at a meeting held on 15 June 2026. Revised Terms will be issued in due course and the Applicant continues to engage with the AP's agent. The AP's representatives also attended an Agent's Group meeting with Fisher German and National Grid on 4 June 2026. No specific concerns have been identified by the AP's agent during these meetings.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to UK Power Networks' works, UK Power Networks held a meeting with the affected party's identified land agent (Brooks Leney) on 18th June 2026. UK Power Networks have proposed a site visit to discuss the proposals with the affected party and their agent, after which specific HOTs will be issued to the affected party/their land agent for review. UK Power Networks intend to continue to work with the landowner and their agent to seek to achieve the rights required voluntarily.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate.

The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

64. AP 64 - Edward Marriage

64.1 Person with Interest in Land (PIL) Reference ID: 2500

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
F-6/62; F-6/63; F-7/10; F-7/13; F7-14; F7-20; F7/22 There are still important points outstanding and the Heads of Terms have not been sufficiently progressed for me to agree with them.	T Summary of Objection The AP has summarised their reasons for objection as follows: The AP notes that there are still important points (F-6/62, F-6/63, F-7/10, F-7/13, F7-14, F7-20 and F7/22) outstanding and the Heads of Terms have not been sufficiently progressed for the AP to agree to them. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 5 (access). Consolidated Response The Applicant can confirm that active engagement has taken place with this AP. A HoTs meeting was held with the landowner and their agent (Whirlledge and Nott) on 25 February to discuss accommodation works, including crossing points and security issues. Accommodation matters have been recorded on the Land Interest Register and Accommodation works (LIRA) and are awaiting confirmation. The AP's agent advised at that time that the HoTs should not be signed at that stage. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

65. AP 65 - Andrew Soar

65.1 Person with Interest in Land (PIL) Reference ID: 3183

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Despite numerous meetings with project representatives many of our questions remain to be answered. Our suggestions over pylon positions have also been ignored. Our preference of underground routing appears to be not effectively considered and no project comparisons are available. Vast amounts of land are being taken for the construction and subsequent access easements with very little in the way of compensation particularly with land value effects. Remains of agricultural land adjacent to the project boundary will be uneconomical to operate farm equipment over due to awkward angles and reduced area within fields. Interference from the transmission of electricity is likely to affect phone internet and GPS equipment which is essential in the operation of modern farm equipment. Suggested per pylon rates of compensation do not account for land use during build or over sail compensation. Corner pylons will	Summary of Objection The AP has summarised their reasons for objection as follows: The AP states that questions remain unanswered and suggestions over pylon positions have been ignored; underground routing does not appear to have been effectively considered with no project comparisons available; vast amounts of land are being taken for construction and access easements with limited compensation; agricultural land adjacent to the project boundary will be uneconomical to operate farm equipment; interference from electricity transmission will affect essential to the operation of modern farm equipment; per-pylon compensation rates do not account for land use during the build or over sail compensation; land used for access but not a pylon upon will require additional compensation; and engagement with the landowner's agents has been minimal. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant confirms that active engagement has taken place with this AP. A meeting was held with the AP's representatives on 9 June 2026 to discuss practical matters associated with the Project, including severed areas, crossing points and pylon siting. Accommodation matters have been recorded on the LIRA and are currently being reviewed. The AP's representatives

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occupy a much greater area than the mid-station pylons.

Land that will be used for access but not actually have a pylon upon it will presumably be compensated over and above the pylon construction rate that claims to cover the whole build project.

Engagement with land owners agents have been minimal.

Applicant's Response

also attended an Agent Group Meeting with Fisher German and National Grid on 4 June 2026. The Applicant's land team continues to actively engage with the AP's agent on these matters.

In relation to the specific concern raised regarding the position of the overhead alignment, the Applicant notes the following. The position of the overhead alignment across the affected parcels (RG79, RG80 and RG81) is dictated by the positions of angle pylons RG76 to the east and RG81 to the west. Pylon RG76 cannot be moved north due to a residential property and fishing lake, and cannot be moved south without transferring effects to multiple residential properties located to the south. Additionally, moves to the south are restricted by the position of angle pylon RG81 which facilitates the alignment south, which is approximately midway between properties on the edges of Snow Street (south-east/east) and Bressingham Common (west). A move in any direction would increase effects on the associated properties.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[REP3-034]** and would present no issues with for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions.

Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs, which include which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) **[REP3-034]**. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project.

APs have also objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to animal health. In response, the Applicant notes that, as well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 which states: "There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences." Although horses are not directly mentioned, there is no evidence to suggest they are any different to other animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project will be designed in accordance with the principles of the Governments Code of Practice 'Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields' to ensure these are mitigated, which include equestrian activities.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line. The Applicant also notes that the Project's development has been undertaken

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Applicant's Response

within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

66. AP 66 - Victoria Jordan

66.1 Person with Interest in Land (PIL) Reference ID: 2305

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant confirms that active engagement has taken place with this AP. A meeting was held with the AP and their agent on 21 January 2026 to discuss HoTs and accommodation works, including crossing points and security fencing. Version 2 HoTs were sent on 9 April 2026, which included an offer of a meeting to discuss the terms. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

An email regarding crossing points was also sent to the agent on 26 June 2026. The Applicant continues to actively engage with the AP and their agent to progress negotiations. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

67. AP 67 - Geraldine Alison Millhouse (As deputy of Court of Protection) for John Terence Millhouse

67.1 Person with Interest in Land (PIL) Reference ID: 28089, 24303, 24301

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Objection raised under advisement of Land Agent (Whirledge and Nott)	Summary of Objection The AP has summarised their reasons for objection as follows: under the advisement of their land agent, Whirledge and Nott. Land Rights Sought All parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant confirms that active engagement has taken place with this AP. Version 2 Heads of Terms were issued to the AP's land agents (Whirledge & Nott) on 16 April 2026. A meeting was held with the AP's land agent on 20 April 2026 to discuss generic Heads of Terms matters, although no plot-specific discussions took place at that stage due to limited engagement. A further telephone call was made on 10 June 2026 to confirm the appropriate land agent contact details. The Applicant notes that all parcels of land in which this AP holds an interest fall within Class 8, meaning that no powers of compulsory acquisition or temporary possession are sought over those parcels. Accordingly, the Applicant is not seeking to compulsorily acquire any land or rights from this AP. The Applicant nevertheless remains willing to engage with the AP and their representatives should they wish to discuss any aspect of the Project or its interaction with their land interests. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach

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Applicant's Response

includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

68. AP 68 - Robert Pearce

68.1 Person with Interest in Land (PIL) Reference ID: 3752

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is that the Heads of Terms are not in a suitable state, strongly objects to the routing of the Project across his land. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTS negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale..

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

69. AP 69 - James Robert Pearce

69.1 Person with Interest in Land (PIL) Reference ID: 2988

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is that the Heads of Terms are not in a suitable state, strongly objects to the routing of the Project across his land, and would prefer underground routing. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTS negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

70. AP 70 - Heather Ann Pearce

70.1 Person with Interest in Land (PIL) Reference ID: 4403

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is that the Heads of Terms are not in a suitable state, strongly objects to the routing of the Project across his land, and would prefer underground routing. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. In relation to the AP's concern regarding underground routing, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

71. AP 71 - Harry James Pearce

71.1 Person with Interest in Land (PIL) Reference ID: 9985

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The heads of terms are not in a suitable state and we strongly object to the routing. If it absolutely has to pass through our land then underground would be much preferred.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP's objection is that the Heads of Terms are not in a suitable state, strongly objects to the routing of the Project across his land, and would prefer underground routing. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. In relation to the AP's concern regarding underground routing, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line. The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have also raised the potential use of offshore and/or HVDC alternatives. In response, the Applicant refers to the relevant sections of its submissions at Compulsory Acquisition Hearing 1 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and also to the relevant sections of the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and the 3.1 Planning Statement **[APP-056]**, in which these alternatives are comprehensively addressed, and, in particular, to the relevant chapter of the Environmental Statement, specifically 6.2 Environmental Statement Chapter 2 - Alternatives **[APP-215]**, where the Applicant has demonstrated why such alternatives do not represent a viable alternative to the Project as currently proposed. The Applicant also refers in this regard to the relevant section of the Examining Authority's report of its 8.4.1 Preliminary Meeting **[REP1-139]** which notes that the need case for the Project is established, and the focus of the examination is on the details of the Project as proposed.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

72. AP 72 - Lodge Lane Estates Ltd

72.1 Person with Interest in Land (PIL) Reference ID: 10205

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, we are not in a position to agree to them.	Summary of Objection The AP has summarised their reasons for objection as follows: The current terms are not satisfactory, and their agent is not in a position to agree to them. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

73. AP 73 - Michael Elwyn Hughes

73.1 Person with Interest in Land (PIL) Reference ID: 5723

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition of my land and rights. The scheme designed by the Applicant is not appropriate and not within the public interest, when there are reasonable alternatives available. The works will potentially affect development proposals on the land. We are yet to see the proposed heads of terms from UKPN, and until these are in a reasonable format, compulsory powers should not be granted.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the compulsory acquisition of their land and rights, including the potential effect on land development proposals. Concern that the proposed Heads of Terms from UKPN have not been resolved, and as such, compulsory powers should not be granted. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 - Compulsory Acquisition of Land). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response In relation to UK Power Networks' position, the affected party's landholding has been identified as falling within an identified limit of deviation for UK Power Networks' 132kV diversion works. At this stage UK Power Networks do not consider that the full extent of the limit of deviation, and therefore the affected party's identified land parcel, will be subject to permanent land rights required by UK Power Networks to deliver the diversion works. For this reason UK Power Networks have not sought to engage the affected party at this stage and no HOTs will be issued. If further to ongoing detailed design works the above position were to change, UK Power Networks would seek to engage the affected party to reach

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

voluntary agreement on required land rights with compulsory acquisition considered to be a last resort in the event rights cannot be achieved voluntarily.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also

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Applicant's Response

says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

74. AP 74 - Peter Blomfield Willows

74.1 Person with Interest in Land (PIL) Reference ID: 6506

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition of my land and rights. The scheme designed by the Applicant is not appropriate and not within the public interest, when there are reasonable alternatives available. The works will potentially affect development proposals on the land. We are yet to see the proposed heads of terms from UKPN, and until these are in a reasonable format, compulsory powers should not be granted.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the compulsory acquisition of their land and rights, including the potential effect on land development proposals. Concern that the proposed Heads of Terms from UKPN have not been resolved, and as such, compulsory powers should not be granted. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. No permanent rights of compulsory acquisition are sought in respect of this AP's land at this time. Consolidated Response In relation to UK Power Networks' position, the affected party's landholding has been identified as falling within an identified limit of deviation for UK Power Networks' 132kV diversion works. At this stage UK Power Networks do not consider that the full extent of the limit of deviation, and therefore the affected party's identified land parcel, will be subject to permanent land rights required by UK Power Networks to deliver the diversion works. For this reason UK Power Networks have not sought to engage the affected party at this stage and no HOTS will be issued. If further to ongoing detailed design works the above position were to change, UK Power Networks would seek to engage the affected party to reach

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Applicant's Response

voluntary agreement on required land rights with compulsory acquisition considered to be a last resort in the event rights cannot be achieved voluntarily.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is

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Applicant's Response

limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With referenceto 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

75. AP 75 - Verity Louise Collins

75.1 Person with Interest in Land (PIL) Reference ID: 7035

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The works will interfere in the operation of the farming business plus effect the value of the land and any future use of the land, farming or otherwise.	Summary of Objection The AP has summarised their reasons for objection as follows: The works will interfere with her farming business and will affect land value and future use of her land. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid and for UKPN in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to the AP's concerns regarding property value and soil handling, the Applicant notes that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. In relation to soil handling, the Applicant will comply with all relevant legislative and policy requirements in relation to soil management during construction. This will be subject to appropriate conditions within the Development Consent Order. The Applicant's Outline Construction Environmental Management Plan (OCEMP), which forms part of the Environmental Statement, sets out the approach to soil management during construction, which will be further developed in the Construction Environmental Management Plan (CEMP) prior to the commencement of construction activities.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

In relation to the AP's concerns regarding the impact of the Project upon agricultural activities, the Applicant notes that, during the construction phase, impacts on agricultural land are expected to be temporary in nature and will be managed through the CEMP. The Applicant's Outline CEMP includes a commitment to minimise disruption to agricultural operations during construction, including in relation to access to fields, soil management and reinstatement. The Applicant recognises the importance of agricultural land and is committed to ensuring that, following construction, agricultural land is reinstated to the same standard as far as reasonably practicable.

In relation to the AP's concerns regarding construction works, the Applicant will ensure that all construction activities are undertaken in accordance with the provisions of the Development Consent Order and all associated documents, including the CEMP. The Applicant is committed to minimising the impacts of construction on those living and working near the route of the Project. This will include implementing mitigation measures such as restricting working hours, managing noise and dust, and maintaining access to land and properties where required.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

76. AP 76 - Hayden Dixon

76.1 Person with Interest in Land (PIL) Reference ID: 3500

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I do not want plant machinery passing close to my fence-line, nor workers overlooking my property	Summary of Objection The AP has summarised their reasons for objection as follows: They do not want plant machinery passing close to their fenceline, nor do they want workers overlooking their property. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 5 (access). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

In relation to the AP's specific concerns regarding construction traffic and proximity to his property, the Applicant is pleased to confirm that no construction traffic is proposed to use this access route. The construction traffic will follow the construction access strategy detailed in **7.3 Outline Construction Traffic Management Plan [Revision F]**. The permanent access right being sought is to enable maintenance access to the overhead line in the event that this is required following construction. The Applicant notes and understands the AP's concerns regarding amenity during the construction period and confirms that construction activities will be managed in accordance with the relevant provisions of the CEMP, which will be designed to minimise disturbance to neighbouring landowners and occupiers.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have raised concerns regarding the Applicant's request for permanent access rights over their land. In response, the Applicant wishes to clarify the purpose and extent of the access rights sought. Permanent access rights are sought in very limited circumstances, principally where they are required to enable ongoing maintenance access to Project infrastructure. The Applicant is committed to ensuring that the exercise of any permanent access rights will be undertaken in a manner which minimises disruption to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

landowners and occupiers, and only where strictly necessary for the maintenance of the Project's infrastructure. The terms on which access will be exercised will be set out in the relevant HoTs and subsequently in the legal agreement governing the grant of rights.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

77. AP 77 - Louise Dixon

77.1 Person with Interest in Land (PIL) Reference ID: 9870

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I do not want views and beautiful countryside developed. I do not want my sunset views removed and replaced by hideous pylons	Summary of Objection The AP has summarised their reasons for objection as follows: They do not want their views of the local countryside to be developed and do not want their sunset views hindered. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 5 (access). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting of infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant effects on landscape character and visual amenity as reported in the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have raised concerns regarding the environmental impacts of the Project. In response, the Applicant notes that the environmental impacts of the Project have been comprehensively assessed in the Environmental Statement which forms part of the application for development consent. The Environmental Statement has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and has been subject to a thorough examination by the Examining Authority. The Applicant is committed to implementing all reasonable mitigation measures identified within the Environmental Statement and, where relevant, the relevant requirements set out within the Development Consent Order. The landscape will remain rural in character following the construction of the Project; however, it is acknowledged that

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

there will be significant effects on landscape character and visual amenity at some locations during both construction and operation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added):

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

"Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

78. AP 78 - Darren Rice

78.1 Person with Interest in Land (PIL) Reference ID: 14524

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Do we live under a dictatorship.?? NO WE DONT.!!! Our family purchased this land generations past to produce food for this country. Not to be ridden roughshod over by an organisation that does care about the Suffolk countryside. OFFSHORE: cheaper, faster, better.	Summary of Objection The AP has summarised their reasons for objection as follows: They have farmed their land for generations and are concerned about the impact the Project will have on their farming operation and the heritage of their land – as well as why offshore alternatives are not being pursued. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant is continuing to engage with the APs representative, with regular meetings held with the Land Agent groups to continue discussions on the HOTs. The Applicant confirms that active engagement has taken place with this AP. A meeting was held with the AP on 22 January 2026 to discuss HoTs and accommodation works relating to the AP's land. Version 2 HoTs were subsequently issued on 9 April 2026, which included an offer of a further meeting to discuss the terms. The AP's representatives attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. An email regarding crossing points was also sent to the AP's agent on 26 June 2026. The Applicant continues to engage with the AP to seek to agree the terms of any voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

79. AP 79 - Susanna Nunn

79.1 Person with Interest in Land (PIL) Reference ID: 28478

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	Summary of Objection The AP has summarised their reasons for objection as follows: The current terms are not satisfactory and at present they cannot agree to them. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

80. AP 80 - Stuart Gooding

80.1 Person with Interest in Land (PIL) Reference ID: 28479

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	Summary of Objection The AP has summarised their reasons for objection as follows: The current terms are not satisfactory and at present they cannot agree to them. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker) - Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

81. AP 81 - Patricia Jane Gooding

81.1 Person with Interest in Land (PIL) Reference ID: 1936

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, I am not in a position to agree to them.	Summary of Objection The AP has summarised their reasons for objection as follows: The current terms are not satisfactory and at present they cannot agree to them. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

82. AP 82 - Personal representative to the estate of Robin John Lacey Gooding

82.1 Person with Interest in Land (PIL) Reference ID: 14961

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our agent has been discussing the Heads of Terms with National Grid but at the moment the current terms are not satisfactory and, therefore, we are not in a position to agree to them.	Summary of Objection The AP has summarised their reasons for objection as follows: The current terms are not satisfactory and at present they cannot agree to them. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

83. AP 83 - Richard Percival Marriage

83.1 Person with Interest in Land (PIL) Reference ID: 7382

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The scope of the compulsory acquisition is beyond that required to facilitate the development. There is no compelling case for the land to be obtained compulsorily especially since National grid have made no serious attempts to obtain rights by negotiation and have merely resorted to threats of withdrawal of offers if not completed within a certain time. This is against the guidance where as all efforts should be made to encourage meaningful relationship between all parties.	Summary of Objection The AP has summarised their reasons for objection as follows: The Applicant notes that the Affected Party does not consider the scope for compulsory acquisition valid, nor the Applicant's approach to engagement with the AP. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response With regard to the AP's specific objection concerning the adequacy of negotiations and engagement, the Applicant provides the following specific details. Version 2 of the Heads of Terms was sent on 2nd April 2026, which included an offer of a meeting to discuss the HoTs, and a follow-up call was made to offer that meeting. The AP's agent is Whirlledge and Nott, who have attended Agent Group Meetings to continue discussions regarding the HoTs. In addition, a HoTs meeting was held with the landowner and agent (Whirlledge and Nott) on 25th February 2026 to discuss accommodation works including crossing points and security

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

issues. At that time, the agent advised the AP not to sign the HoTs. The Applicant therefore strongly disputes the characterisation that no serious attempts have been made to negotiate, and reiterates its commitment to reaching a voluntary agreement. The Applicant does not agree that the scope of the compulsory acquisition powers sought exceeds that which is reasonably required for the Proposed Development. The land and rights included within the Order have been identified through the design process and have been limited to those considered necessary for the construction, operation and maintenance of the Proposed Development.

The Applicant also does not agree that it has failed to make serious attempts to acquire the necessary rights by negotiation. The Applicant and its appointed land agents have engaged extensively with affected persons throughout the development of the Project and have sought to progress voluntary agreements wherever possible. The Applicant notes the Affected Person's assertion that they were threatened with the withdrawal of offers if agreements were not completed within a particular timeframe. The Applicant does not accept that it has issued threats to affected persons. Any correspondence referring to the duration or validity of offers has been provided as part of the normal course of commercial negotiations and to explain the basis upon which offers have been made, rather than to discourage engagement or agreement.

The Applicant remains committed to constructive and meaningful engagement with affected persons and their representatives and continues to seek to secure land rights by agreement wherever possible. Notwithstanding ongoing negotiations, the Applicant considers that there remains a compelling case in the public interest for the acquisition of the land and rights required for the Proposed Development and that the requirements of sections 122 and 123 of the Planning Act 2008 have been satisfied.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]**

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

84. AP 84 - Copy Hold Vermögens-Verwaltungs-ges

84.1 Person with Interest in Land (PIL) Reference ID: 4316

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• We do not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. • We do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. • The Applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. • The rights being sought may be wider than necessary for the scheme. • The Heads of Terms are still not in a reasonable or acceptable format. • The current Heads of Terms impose unfair and unreasonable restrictions on landowners. • We do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary,	Summary of Objection The AP has summarised their reasons for objection as follows: The AP raises a number of objections, including: compulsory acquisition, alternatives to reduce the impact on their holding, not taken sufficient steps to reduce impacts and mitigate losses; rights being sought may be wider than necessary; Heads of Terms are not in a reasonable or acceptable format / impose unfair and unreasonable restrictions on landowners; not demonstrated that the interference with their land and rights is necessary, proportionate, or limited to what is reasonably required. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid and for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response With regard to specific engagement with this AP, the Applicant notes that an accommodation works meeting was held on 10 March 2026 at which UKPN interaction was reviewed alongside soils, severed areas, and crossing points. A further agents' meeting was held on 20

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

proportionate, or limited to what is reasonably required

April 2026. Version 2 of the Heads of Terms was issued to the agent on 21 April 2026 with an offer of a meeting to discuss those terms.

In relation to the AP's concerns regarding the positioning of pylon TB209 and alternative configurations, the Applicant notes the comments from the AP and has reviewed and assessed the alternatives suggested and has responded previously in 8.8.1 Applicant's Comments on Written Representations **[REP2-029]**. The positioning of TB209 is influenced by a Public Right of Way along the field boundary. Movement wholly to the field to the north would have knock-on effects for pylon TB208 and would be likely to move that pylon closer to residential property. Some adjustment within Limits of Deviation is likely to be possible to position the pylon closer to the boundary. This will be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

85. AP 85 - Susan Standen & Kevin Standen

85.1 Person with Interest in Land (PIL) Reference ID: 8798, 8336

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The proposed haul road close to our property and the proposed traffic lights adjacent to our property will lead to lack of access and obstruction of our drive potentially making it inaccessible for the duration of the project.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the proposed haul road and traffic lights adjacent to their property, which will potentially make their drive inaccessible during the project. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 7 (temporary use). The APs have interest in plots E-5/81, E-5/88. Consolidated Response With regard to the specific engagement with this AP, Version 2 of the Heads of Terms was sent on 2nd April 2026, which included an offer of a meeting to discuss the HoTs; however, no meeting has been held to date. The Applicant notes that the AP's land interest within the Order Limits is minimal, limited to an encroachment of a visibility splay, and that the AP's primary concern is the visual and property value impact of the scheme. The Applicant notes the AP's specific concerns regarding the location of the haul road and traffic management. The proposed bellmouth and haul road have been located far enough away from the AP's access in order to avoid any disruption to the access. Traffic lights may only be required for the construction and removal of the temporary bellmouth whilst it is constructed. However, other forms of traffic management may be selected by the contractor. The design and position of any traffic lights or traffic management will be undertaken by the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

contractor at the detailed design stage and will not be located in a position which prevents access.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

86. AP 86 - Graham Moore

86.1 Person with Interest in Land (PIL) Reference ID: 624, 5938, 28355

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I am a small farm and it is going to slice through the middle of my business, home and main growing field making it unviable to farm and live. It makes it unable for the local airfields to fly killing local economy and I object on health reasons of the EMF magnetic waves affecting me running my farm safely and me and my families health.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the Project passing through the middle of his farm, the economic impact preventing local airfields from operating, and the health concerns from the proposed overhead line infrastructure. Land Rights Sought The AP holds freehold and occupier interests (Category 1) in a number of agricultural plots in Section A-8, including plots A-8/64–65, A-8/67, A-8/69–72, A-8/74–80, A-8/83–86, A-8/89–102. The Applicant is seeking a combination of permanent rights and temporary possession powers across those plots, including Class 2, 3 and 4 rights on a number of plots identified in the DLRT. Engagement has included meetings with the AP and their agent on 23 January 2026, 20 April 2026 and 26 May 2026, together with ongoing Heads of Terms negotiations. Version 2 Heads of Terms was issued on 9 April 2026 and engagement remains ongoing. Consolidated Response With regard to the specific engagement with this AP, a meeting was held with the AP and their agent on 23rd January 2026 to discuss practical matters associated with the Project, including permanent access routes and UKPN mitigation works. Engagement with the AP's representatives has continued and the Applicant's agents have met with the AP's representatives multiple times to negotiate and progress the Heads of Terms, with the most recent meeting being held on 26th May 2026. Version 2 of the Heads of Terms was sent on 9th April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative also attended an Agent's Group Meeting with Fisher German and National Grid on 4th June 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In respect of the concerns relating to local airfields, the perceived impacts on aviation have been assessed in detail throughout the examination at the oral hearings and in many written submissions. The Applicant maintains its position that both Priory and Tibenham airfields can continue to operate.

Impacts on local airfields have been assessed through the Environmental Impact Assessment (EIA) process, with impacts during both the construction and operational phase of the Project presented in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** and 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [Revision C]. The latter includes an assessment of effects as they relate to Tibenham and Priory airfields in particular, concluding that both airfields can continue to operate. Discussions are ongoing with both operators.

Impacts on agricultural operations are presented in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]**. During construction, agricultural operations may experience disruption due to factors such as disturbance, fragmentation of land, access restrictions, or disruptions to water supplies and drainage. By the end of construction, all land required temporarily would be reinstated, and effects on agricultural operations during the construction phase would be managed through compensation agreements (which lie outside of the EIA process). The implementation of good practice measures would ensure that disruption is minimised, and this is described in 7.2 Outline Code of Construction Practice [Revision G]. Effects on agricultural landholdings during the operational phase of the Project was scoped out of the Environmental Statement and this is set out in 6.20 Scoping Opinion **[APP-297]**.

In relation to the alignment in the vicinity of this AP's land, the Applicant has looked at alternative alignments. Moving RG52 to the east would increase effects on Tibenham and Priory airfields. Moving to the east or west would also transfer effects onto other residential properties and would introduce additional angles and would be longer and less direct, which would be less consistent with the Holford Rules. The Applicant acknowledges the concern that the Proposed Development could affect the operation of the farming business. The Applicant has sought to minimise impacts on agricultural land and farm holdings through the route selection and design process and will continue to engage with affected landowners to understand farm-specific requirements. The Applicant does not agree that the Proposed Development would render the holding unviable. Access to retained land will be maintained,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and where land is required permanently or temporarily, compensation will be available in accordance with the statutory compensation code. The Applicant will continue discussions with the landowner to identify measures which may reduce disruption to the ongoing operation of the farm.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Electric and Magnetic Field Compliance Report [REP3-034] and would present no issues with for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions. Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) [REP3-034]. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project. APs have also objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to animal health. In response, the Applicant notes that, as well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 which states: "There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences." Although horses are not directly mentioned, there is no evidence to suggest they are any different to other animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project will be designed in accordance with the principles of the Government's Code of Practice 'Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields' to ensure these are mitigated, which include equestrian activities.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to exploring appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

87. AP 87 - Nicola Moore

87.1 Person with Interest in Land (PIL) Reference ID: 624, 5938, 28355

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to National grid ploughing straight through the middle of our farm financially ruining us. Straight through our main growing field and our him we will be ruined by the project. I object to the project stopping two local airfields from flying due to safety issues listened to and I object to the EMF waves given off as my family and I do not want to live in a house next to a pylon giving off electric waves that may affect our health and enjoyment of our home and have the danger of my husband safely farming.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP objects to the Project passing through the middle of his farm, the economic impact preventing local airfields from operating, and the health concerns from the proposed overhead line infrastructure. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response With regard to the specific engagement with this AP, the Applicant notes that the same engagement history applies as for Graham Moore. A meeting was held with the AP and their agent on 23rd January 2026 to discuss practical matters associated with the Project, including permanent access routes and UKPN mitigation works. Engagement with the AP's representatives has continued and the Applicant's agents have met with the AP's representatives multiple times to negotiate and progress the Heads of Terms, with the most recent meeting being held on 26th May 2026. Version 2 of the Heads of Terms was sent on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

9th April 2026, which included an offer of a meeting to discuss the HoTs. The AP's representative also attended an Agent's Group Meeting with Fisher German and National Grid on 4th June 2026.

In respect of the concerns relating to local airfields, the perceived impacts on aviation have been assessed in detail throughout the examination at the oral hearings and in many written submissions. The Applicant maintains its position that both Priory and Tibenham airfields can continue to operate. Impacts on local airfields have been assessed through the Environmental Impact Assessment (EIA) process, with impacts during both the construction and operational phase of the Project presented in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** and **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [Revision C]**. The latter includes an assessment of effects as they relate to Tibenham and Priory airfields in particular, concluding that both airfields can continue to operate. Discussions are ongoing with both operators.

Impacts on agricultural operations are presented in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]**. During construction, agricultural operations may experience disruption due to factors such as disturbance, fragmentation of land, access restrictions, or disruptions to water supplies and drainage. By the end of construction, all land required temporarily would be reinstated, and effects on agricultural operations during the construction phase would be managed through compensation agreements (which lie outside of the EIA process). The implementation of good practice measures would ensure that disruption is minimised, and this is described in 7.2 Outline Code of Construction Practice **[Revision D]**. Effects on agricultural landholdings during the operational phase of the Project was scoped out of the Environmental Statement and this is set out in 6.20 Scoping Opinion [APP-297].

In relation to the alignment in the vicinity of this AP's land, the Applicant has looked at alternative alignments. Moving RG52 to the east would increase effects on Tibenham and Priory airfields. Moving to the east or west would also transfer effects onto other residential properties and would introduce additional angles and would be longer and less direct, which would be less consistent with the Holford Rules.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]**

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. Some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report [REP3-034] and would present no issues for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions. Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	for managing EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines, is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) [REP3-034]. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project. APs have also objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to animal health. In response, the Applicant notes that, as well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 which states: "There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences." Although horses are not directly mentioned, there is no evidence to suggest they are any different to other animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project will be designed in accordance with the principles of the Government's Code of Practice 'Power Lines: Control of Microshocks and

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Applicant's Response

other indirect effects of public exposure to electric fields' to ensure these are mitigated, which include equestrian activities.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to exploring appropriate and proportionate options to mitigate the effects of the project during

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the

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Applicant's Response

proposals taken forward. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

88. AP 88 - Christopher John Thorogood

88.1 Person with Interest in Land (PIL) Reference ID: 9128

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Heads of terms are not acceptable	Summary of Objection The AP has summarised their reasons for objection as follows: The Heads of Terms are not acceptable. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response With regard to the specific engagement with this AP, Version 1 of the Heads of Terms was issued in October 2025 and Version 2 was issued in April 2026. A Heads of Terms meeting was held with the landowner and their agent Grace Gardiner (Whirlledge & Nott) on 24th February 2026 to discuss accommodation works in greater detail, including crossing points and site security. The AP was at that time taking advice from their land agent on their HoTs position. Accommodation-related requests have been captured on the LIRA, awaiting approval. The Applicant reiterates its commitment to continuing to progress towards a voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

89. AP 89 - Gillian Mather

89.1 Person with Interest in Land (PIL) Reference ID: 8424

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are hampered in making any arguments over any application by National Grid to acquire compulsory rights over our land since we don't know what exactly National Grid propose to do or how they propose to overcome any of the physical obstacles which the site presents since they do not engage with us and ignore representations we have made in responses to consultations etc. To be explicit, the site may ultimately require HDDing rather than trenching, but National Grid won't discuss this, although in one of their documents put out several years ago they did propose HDDing under the Blackbrook Stream at Langham and therefore under our land immediately to the south of the Blackbrook. However, they withdrew this plan without explanation or notice. We have attempted to query with National Grid at various stages including at an early stage how they plan to tackle the physical complications of laying cables under the undulating, hilly site including Blackbrook	Summary of Objection The AP has summarised their reasons for objection as follows: The AP are unable to make the necessary objections because the Applicant does not engage nor respond to their representations made. They note that the site may ultimately require Horizontal Directional Drilling ("HDD"), given the presence of Blackbrook Hill, the Blackbrook Stream, and a high-pressure gas main. They state that the Applicant previously withdrew plans without explanation. They assert that any attempt to seek compulsory rights would require a final decision has been made on the construction methodology, as rights to trench or HDD would need to be worded differently. They confirm willingness to enter into a voluntary agreement and that their land agents are working to agree Heads of Terms, though no agreement has been reached. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, and Restrictive Covenants. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response With regard to the specific engagement with this AP, Version 2 of the Heads of Terms was issued on 26th March 2026. The Applicant remains in dialogue with the AP's agent to

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Hill, the Blackbrook Streat, our land and the high-pressure gas main to the south but without response. In view of the above, any attempt to seek compulsory rights would be premature until National Grid have made a final decision how to go about the laying of cables under our land, since it is assumed that rights to trench or alternatively HDD would have to be worded differently. We have already communicated to National Grid that we are willing to enter into a reasonable agreement to grant them necessary and reasonable rights therefore compulsory action should be unnecessary. Our land agents are in the process of attempting to agree Heads of Terms with National Grid though there is no agreement at the moment. Whether National Grid have taken all necessary prescribed steps before making any application(s) to compulsorily acquire rights over our land and considered all other options is a huge technical question given the size of the Norwich to Tilbury project and the amount of paperwork and information so far generated. I can't answer the point.	negotiate the HoTs and remains committed to reaching a voluntary agreement. The most recent meeting held was on 4th June 2026, with revised terms to be issued shortly thereafter. The Applicant is aware of the issues raised by the AP from a site meeting and believes that answers have been provided by the design team. In response to the AP's concerns regarding the construction methodology at Black Brook, the Applicant confirms that it is proposing to undertake the crossing of Black Brook and the associated constraints in this area via open cut trenching. As indicated within Page 511 of the Application Document 8.4.1 Applicant's Response to Relevant Representations [REP2-023], the potential to cross Black Brook using trenchless techniques has been considered but it was concluded that with around 80m spacings between residential property and the veteran tree, there is insufficient space to accommodate Horizontal Directional Drilling which needs cables (of which there are 18) to be separated by 10m to allow for directional variability. This requires an overall cable swathe of around 170m width compared with approximately 55m cable swathe for open cut installation. The Applicant is aware of the significant constraints in this area including the gas pipeline, topography, overhead line and Black Brook itself and is working with stakeholders to address these challenges. The Applicant has experience of installing cables through constrained locations and is confident that the approach proposed is viable. The Applicant will produce further detail at the detailed design stage of the project and will continue to look for opportunities to minimise impacts at this pinch point crossing location. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line. The Applicant also notes that the Project's development has been undertaken within the context of the relevant planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

90. AP 90 - Stuart Philpot (SJR Farming Ltd)

90.1 Person with Interest in Land (PIL) Reference ID: 10273

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We do not want this on our land, thank you.	Summary of Objection The AP has summarised their reasons for objection as follows: They do not want the Project on their land. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, and Restrictive Covenants. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response With regard to the specific engagement with this AP, Version 1 of the Heads of Terms was issued in October 2025, with revised Version 2 issued in April 2026. No site meeting has been held following the issuance of those terms. Multiple requests for a HoTs meeting have been made through the AP's agent Grace Gardiner (Whirledge & Nott), the most recent of which was on 18th May 2026. The Applicant notes that the AP is impacted by the alignment and number of towers across their holding and continues to pursue a meeting to discuss alignment and accommodation concerns. The Applicant reiterates its commitment to reaching

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a voluntary agreement and its continued efforts to secure a meeting with the AP and their agent.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

91. AP 91 - Richard Turner

91.1 Person with Interest in Land (PIL) Reference ID: 14378

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Boxted Airfield Museum. The erection of the pylons and the construction works beforehand would seriously disrupt our openings in the following ways. The roadways on site date from WW2 and we take visitors on guided walks, these are single carriageway so there would be a risk to the walkers from construction vehicles. This WW2 Airfield site was the base for the Most important American Fighter Aircraft Group serving in Europe. Visitors and relatives of the men who served come to the Museum to get the feel of what their Grandfathers and fathers experienced. 12000 men were stationed here during the course of the second world war. The erection of the pylons would completely spoil the views and destroy the enjoyment for these families. We have then and now pictures on our website and within the Museum and to have those showing pylons I am sure would put visitors off and seriously affect our revenue. The National Lottery recognized this as a Heritage site	Summary of Objection The AP has summarised their reasons for objection as follows: On behalf of Boxted Airfield Museum, they object on the basis that the erection of pylons and associated construction works would seriously disrupt the museum's operations and the grass airstrip in the summer months, used by a flying club, including visiting aircraft displayed on special open days. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should

Please summarise (in no more than 1500 words) the reason(s) for your objection

helping us with financial grants over the years.

In the summer months a grass airstrip is established behind the Airfield memorial off Park Lane and is used by a flying club, the pylons would seriously affect this activity. We also have visiting aircraft display on special open days.

Applicant's Response

they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

In relation to the concerns raised regarding the Boxted Airfield Museum, potential impacts on the museum have been assessed through the Environmental Impact Assessment (EIA) process. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism **[Revision C]** presents an assessment of potential impacts on built assets (which includes tourism and community facilities) during both the construction and operational phases of the Project. During the construction period, it is noted that the direct access to the museum is along a minor road which falls within the Order Limits; however, access to the Museum would be maintained at all times during construction. Relevant mitigation measures are set out in 7.2 Outline Code of Construction Practice **[Revision G]** and 7.3 Outline Construction Traffic Management Plan (CTMP) **[Revision F]**. During the operational phase of the Project there would be a permanent acquisition of rights of access in relation to an existing access track; however, no physical works are proposed and routine inspections and maintenance activities are not expected to occur frequently during the operation period. As such, no significant effects are anticipated on the Airfield Museum during either the construction or operation phase of the Project.

Concerning the potential impacts of the Project on aviation, please refer to 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact **[Revision C]**. It identifies Boxted airfield as not operational. This followed engagement with former users who previously hosted aviation events at the site and advised that the runway was no longer useable. It is listed as disused on current aviation charts. Early engagement with the site owner did not reveal aviation concerns in relation to the Project. No impacts on the safety or operation of the airfield have therefore been assessed. See also page 246 of 8.8.1 Applicant's Comments on Written Representations **[REP2-029]**, responding to **[REP1-209]**.

There is no alternative route available to the Project to the north side of Colchester, and in light of the aviation situation, an overhead line solution is preferred and is consistent with policy. Routes to the south of Colchester affect areas designated as Special Protection Areas that are to be avoided where other options are available.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

92. AP 92 - Tamasyn Holland

92.1 Person with Interest in Land (PIL) Reference ID: 28603, 20989

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I strongly object to the proposed pylons being located on or affecting my land due to the significant visual, environmental, and property impacts. This proposal would cause unacceptable harm to my property rights, amenity, and the surrounding landscape.	Summary of Objection The AP has summarised their reasons for objection as follows: The proposed pylons would impact their land visually, environmentally, as well as their property rights. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground system), Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). The APs have an interest in plots E-1/39, E-1/56, E-1/69-70, E-1/72-73, E-1/77-81, E-1/83-89, E-2/12, E-2/15, E-2/16, E-2/19-20, E-2/26-27, E-2/31, E-2/33, E-2/35-36, E-2/38 E-2/41, E-2/44, E-2/59, E-2/61, E-2/73, E-2/75-78, E-2/82, E-2/85, E-2/87, E-2/90, E-2/98, E-2/110 Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026 The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting of infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

effects on landscape character and visual amenity as reported in the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment. In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism, and traffic and transport. Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

93. AP 93 - Rachel Bryan

93.1 Person with Interest in Land (PIL) Reference ID: 28943

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
There are still important points outstanding and the Heads of Terms have not yet been sufficiently progressed	Summary of Objection The AP has summarised their reasons for objection as follows: Still important points outstanding and the Heads of Terms have not yet been sufficiently progressed. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Correspondence has been had with the APs representative regarding queries raised specifically for the AP. Continued engagement with the APs representative is underway regarding HOTS negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-

Please summarise (in no more than 1500 words) the reason(s) for your objection

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based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

94. AP 94 - Andrew David Upson

94.1 Person with Interest in Land (PIL) Reference ID: 4711

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP. Land Rights Sought The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

95. AP 95 - Janette Upson

95.1 Person with Interest in Land (PIL) Reference ID: 7032

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Objection

No written reasons for objection have been provided by the AP.

Land Rights Sought

The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure) (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

96. AP 96 - F H Easton Limited

96.1 Person with Interest in Land (PIL) Reference ID: 10198

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I am not familiar the various Acts, Sections etc listed above no more than NG are familiar with the growth stages of winter wheat. Without more detail it is difficult to articulate objections precisely on the consequences of what such interference to our land will have. At best compulsory rights will add or bring nothing to the farm and at worst blight and devalue the holding. Those acquiring temporary rights will have little to no interest in the long term effect they may have on the land and it will take a long time, possibly decades to recover from any works. This prediction is based upon more than one poor experience with civil contractors working on our farm.	Summary of Objection The AP has summarised their reasons for objection as follows: The AP states that compulsory rights will devalue the holding, and that the Applicant will have little to no interest in the long-term effect on the land. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response With regard to the specific engagement with this AP, discussions are ongoing with this party and their agent Richard Prentice. Version 2 of the Heads of Terms was issued on 9th April 2026. The Applicant attended a meeting with the AP on 21st January 2025 to discuss accommodation works that could be put in place to mitigate identified issues and ensure the AP could continue their agricultural operations. Ongoing concerns regarding the Project were noted at that time and relayed back to National Grid. Following this, the Applicant met with the AP's agent on 26th May 2025 to discuss reducing the grantor's land shown on the HoTs plans

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and to confirm the severed areas. The Applicant also attended the Agents Group Meeting on 4th June 2026 where the wider terms of the HoTs were discussed.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

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times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have asserted that the Project will have a negative impact on the value of their property. Whilst the Applicant recognises that there will inevitably be some impact on property values arising from a project of this nature, the Applicant does not consider that this, of itself, provides grounds upon which the authorisation of CA and TP powers should be refused. It should be noted that the Applicant has in place a Voluntary Compensation Scheme for those residential properties affected by the Project and has issued guidance on what the scheme entails. Affected persons are directed to the Applicant's website for further information on the scheme. The Applicant also notes that a statutory blight scheme exists for those properties where there is a qualifying interest, and the Applicant has engaged and continues to engage with those affected persons who have asserted their interest in pursuing a blight claim. Owners of qualifying agricultural properties who live within the agricultural unit may also benefit from the blight regime, subject to the satisfaction of the relevant criteria. The Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

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acknowledges that there is no statutory compensation for loss of value to dwellings arising from the use of a development (in this case the construction and/or operation of the Project). However, the Applicant has chosen to go beyond the statute and has in place a Voluntary Compensation Scheme for qualifying residential properties affected by the Project.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

time when any construction works will take place. The Applicant remains committed to exploring appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

97. AP 97 - British Pipeline Agency Limited (BPA) as agents for and on behalf of United Kingdom Oil Pipelines Limited (UKOP)

97.1 Person with Interest in Land (PIL) Reference ID: 21224

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
UKOP is the owner of the 14-inch Thames to Epping high pressure multi fuel pipeline (hereafter called the "Pipeline") and benefits from the associated land rights relating to the Pipeline. BPA is employed as agent by UKOP to operate and maintain the Pipeline and act on its behalf in this DCO process. The below summary is by way of update to the presentations and submissions made on behalf of BPA / UKOP to date including RR-0413, PDA-011, AS-086, REP1-235-238 (inclusive), REP3-121 and the oral submissions made by Fieldfisher on behalf of BPA / UKOP at CAH1. With reference to whether the purposes for which compulsory acquisition powers are sought comply with section 122(2) of the Planning Act 2008 and whether the compelling case in the public interest test	Summary of Objection The AP has summarised their reasons for objection as follows: BPA, as agent for UKOP, raises an objection in its capacity as operator and owner respectively of fuel pipeline asset (the "Pipeline"). They note that the proposed compulsory acquisition in the current form of the draft DCO poses an unacceptable risk to the safety of the Pipeline and by extension to the environment. UKOP requires the rights sought in the Change Request accepted into the Examination to enable it to carry out the works proposed under Work [17A]. The AP contends that UKOP is the owner of nationally significant high pressure fuel infrastructure that should be treated equivalently to a Statutory Undertaker, and that it requires an asset protection agreement to ensure appropriate protection for the UKOP apparatus. The AP maintains its objection until adequate mitigation measures and long-term safeguards are guaranteed and formalised. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege and Restrictive Covenants. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

under s122(3) of the Planning Act has been met, UKOP's position is as follows:

1.1 The private loss which may be suffered by BPA and UKOP (as well as the consequential impacts to persons, the environment, and the key end users operating crucial national infrastructure) are of vital importance as to whether considering whether there is a compelling case for compulsory acquisition.

1.2 BPA and UKOP remain of the view that, absent the Order being confirmed with the benefit of the change request as applied for, and further agreements being entered into with the Applicant, the proposed compulsory acquisition in the current form of the dDCO pose an unacceptable risk to the safety of the Pipeline and by extension the environment.

1.3 UKOP requires the rights sought in the Change request which has now been accepted into the Examination to enable it to carry out the works proposed under Work [17A].

1.4 Section 127(5) Planning Act 2008 states that in the case of statutory undertakers the SoS should be satisfied that the rights can be purchased without any serious detriment to the carrying on of the undertaking and that any consequential detriment to the carrying on of the undertaking can be made good by the undertaker by the use of other

Applicant's Response

The Applicant has been engaging with BPA/UKOP asset protection teams significantly since 2023 to identify, de-risk and manage the interactions between BPA/UKOP existing apparatus and the Applicants proposed scheme. This engineering engagement culminated in Change Application 1 which both parties engineering disciplines had substantial involvement in.

A Change Application has been submitted to, and accepted by, the Examination Authority as part of the draft DCO for consideration, which seeks to further address those concerns raised by BPA/UKOP and enable Work 17A to be carried out. In respect of the AP's concerns regarding the Pipeline and the legal protections being sought, the Applicant and BPA/UKOP have agreed the terms of a legal agreement which is now being entered into between the parties to mitigate the concerns raised by BPA/UKOP and secure the removal of their objection to the draft DCO. To the extent that the parties have not finished the process of execution of the agreement before Deadline 7, Protective Provisions for the benefit of BPA/UKOP will be included in the draft DCO until such time as the agreement is completed.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land belonging to or available for acquisition by the undertaker.

1.5 UKOP is not a Statutory Undertaker BUT it is the owner of Nationally Significant high pressure fuel infrastructure and as such it and the risks associated with its infrastructure, should be treated equivalently. There is a very real need to ensure robust protections (both practically and in terms of legal rights) to ensure the ongoing use and maintenance of the Pipeline given the reasons of national energy security. In addition to the legal rights sought via the change request UKOP require the Applicant to enter into an asset protection agreement to ensure appropriate protection for the UKOP apparatus.

1.6 BPA/UKOP need to ensure that the necessary rights can be guaranteed to be obtained via the Order powers in accordance with the change request to ensure that that:

(a) the Order can deliver the necessary powers to cross the Pipeline without serious detriment; or

(b) it has or can acquire the necessary land to deliver such mitigation as may be necessary.

While BPA / UKOP continue not to have objections to the Project in principle, they do require the Order, as amended by the change request, to be confirmed to ensure

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that their concerns are fully addressed and suitable protections are secured, preferably by private treaty.

BPA / UKOP acknowledge the Applicant's constructive engagement, regular meetings and ongoing efforts to agree contractual protections for the Pipeline, with the aim of reaching a settlement by Deadline 6 so that the objection can be withdrawn.

However, until adequate mitigation measures and long-term safeguards are guaranteed and formalised, BPA / UKOP maintain their objection in light of the significant risk of damage to the Pipeline, including accelerated corrosion, which could endanger the public, the environment, and the resilience of nationally significant fuel infrastructure until the Asset Protection Agreement is in place. Those risks and

98. AP 98 - Mr Toby Reeves

98.1 Person with Interest in Land (PIL) Reference ID: 15979

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
All myself and other parties on the site would like is a transparent view on what the project entails. I had a teams meeting with a chap based in bury st Edmunds named Toby who stated wooden pylons in the field adjacent would be removed and replaced with an underground system but this was some time ago. Has this changed since as the project moves forward at your end? The letters you send us tell us nothing at all in real terms. If we can be confident in your proposal then this moves forward along quite nicely but if you are not clear with us then naturally this will slow things down. Nobody wants this. It actually prevents us and others from listing our properties, should we wish to do so as well as being unsettling as to both current and future values of our homes. Homes we have worked our whole lives for.	Summary of Objection The AP objects to: (1) the lack of clarity about what the project will involve; (2) uncertainty about whether the proposed replacement of a nearby wood pole line with an underground cable is still part of the proposal; (3) the possibility of future works, and the lack of detail about them; (4) the lack of detail in letters sent by National Grid to the AP so that the AP cannot have confidence about how the project will affect them. (5) uncertainty caused by the project which could impact the current and future value of the AP's home. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, and a right of Easement. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN in connection with this project over land in which this AP holds an interest: Class 3 (underground cable infrastructure), and Class 4 (overhead line and underground cable infrastructure) Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Please rectify this matter by contacting myself on either [REDACTED]	applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project Consolidated Response In relation to the AP's concerns: Update on the placement of the wood pole line - The proposal to underground the existing 11kv wood pole line is part of the Project. The existing line is situated in scrub area between the access to the properties to the east and the agricultural land to the west. The Applicant and UKPN will continue to engage with the AP as the UKPN's detailed design and construction methodology for the necessary works progresses. Giving the AP greater certainty; further discussions - Conversations with APs about the detail of proposals help to answer questions and can resolve many concerns. The Applicant agrees with the AP's suggestion that further discussions could be useful. Contact will be made shortly to arrange a discussion and/or a meeting with the relevant team members. The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (*emphasis added*): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset.”

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report – including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

99. AP 99 - Oliver Lukies

99.1 Person with Interest in Land (PIL) Reference ID: 10225

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We act on behalf of our client Seventyholds Ltd, whose freehold land is impacted by the proposed Norwich to Tilbury scheme. On behalf their behalf, we object to the proposed interference with their land and rights in relation to the Planning Act 2008. Seventyholds Ltd has been promoting, for over 10 years, a comprehensive scheme for the delivery of Southfields Village and Country Park in Thurrock. The current alignment of the proposed overhead line would have a fundamental and unacceptable impact on the deliverability of the scheme. The Southfields proposal comprises a residential-led development of approximately 800 dwellings and a Country Park, including the restoration and long-term public use of an approximately 80-acre former landfill site owned by Thurrock Council. The proposal has been subject to extensive technical work and engagement and represents a deliverable scheme bringing clear housing, environmental and community benefits. The Country Park	Summary of Objection The Applicant notes that Oliver Lukies acts on behalf of Seventyholds Ltd, whose freehold land is impacted by the proposed Norwich to Tilbury scheme. The AP objects to (1) the proposed interference with their land and rights; (2) the significant impact that the Norwich to Tilbury project will have on the proposed 800 dwelling Southfields Village and Country Park, which will be made commercially unviable because of land occupied, visual intrusion across the wider site, and market perception; (3) the sterilisation of a well-developed scheme which would deliver substantial public benefits including housing, environmental regeneration and community benefits; (4) the failure to use a reasonable alternative alignment further south along the east side of Buckingham Hill Road, crossing just south of the Holford Road junction; (5) the absence of compelling case in the public interest to justify compulsory acquisition, and the use of statutory powers in s122 and s123 Planning Act 2008. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, occupation, and a right of Easement. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); Class 5 (access); Class 6 (drainage infrastructure), and Class 7 (Powers of temporary possession). The Applicant is seeking to acquire the following permanent rights for UKPN in connection with this project over land in which this AP holds an interest: Class 7 (Powers of temporary possession)

Please summarise (in no more than 1500 words) the reason(s) for your objection

forms part of an agreed regeneration approach involving Thurrock Council.

As currently shown, the proposed 400kV overhead line crosses the southern part of the Southfields site and affects the adjacent landfill regeneration area through the location of new pylons. The effect would be to blight the site to the extent that the residential development would be commercially unviable. The impact is not limited to the land directly occupied, but extends across the wider site through visual intrusion and market perception. In addition, the proposed pylon positions would prejudice the agreed regeneration of the landfill site and restrict the delivery of the Country Park. Taken together, the current alignment would sterilise a well-developed scheme which would otherwise deliver substantial public benefits.

A reasonable alternative alignment is available. The line could continue further south along the east side of Buckingham Hill Road, crossing just south of the Holford Road junction. This would remove the blighting effect upon the proposed village site, and the regenerated for recreation purposes Buckingham Hill Road Council-owned refuse tip, while occupying land which is presently vacant and unlikely to ever be considered for residential development. There is no evident reason

Applicant's Response

Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

With regard to the specific engagement with this AP, the most recent meeting was held on 19th June 2026; there had been previous attempts at meetings, although this is the most recent. BCLP are instructed for the Heads of Terms (currently pending from Project Manager). The AP has concerns over the construction methodology, the location of pylon TB224, and the potential impact on PV panels and shading. The current design is being reviewed to assess whether changes can be made to accommodate these concerns, although other issues would arise from any movement, such as SUDs relocation.

The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routing and siting of infrastructure. The Applicant notes the concern related to views from the proposed Southfields Village and Country Park. Effects on visual receptors are set out under Visual Receptor Area (VRA) H6 Southfields (paragraphs 13.11.64 to 13.11.75) and VRA H7 Linford (paragraphs 13.11.76 to 13.11.87) in Section 13.11 in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [Revision B]**. Significant visual effects are identified within approximately 1.5 km of the Project. Effects on landscape receptors within the area are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [Revision B]** under Landscape Character Area (LCA) H1 East and West Tilbury Open Undulating Farmland in paragraphs 13.3.1033 to 13.3.1049. Significant effects are identified within approximately 1.5 km of the Project. The cumulative effect between the Project and the Southfields proposal is set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** and concludes that there would be significant residual inter-project cumulative landscape and visual effects.

The cumulative effect between the Project and the Southfields proposal as set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** also includes an assessment of cumulative effects as they relate to socio-economics, recreation and tourism. No significant cumulative effects have been identified.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
why this alternative would result in any material increase in construction cost or complexity. Again, the current positing of the pylons and overhead lines cannot be regarded as the least harmful option. The proposal falls to be considered under the Planning Act 2008. Section 122 provides that compulsory acquisition may only be authorised where the land is required for the development and there is a compelling case in the public interest. The requirement that land is "required" is a substantive test. Where a reasonable alternative exists which avoids significant harm, it is difficult to conclude that land in this location meets that test. The public interest test requires the benefits of the scheme to be weighed against the harm. Here, that harm includes the loss of a viable housing and regeneration scheme, which weighs heavily against the current alignment. Section 123 further requires that compulsory acquisition is properly justified. Given the availability of a less harmful alternative, the inclusion of the Southfields land within the Order limits cannot be regarded as justified or proportionate. Government guidance reinforces these principles, requiring a clear justification for all land included and a proper balance between public benefit and private loss, taking account of alternatives. The availability of a reasonable alternative alignment significantly weakens any case	In relation to the AP's proposed alternative alignment, the Applicant notes that the suggested alternative was also less preferred as it required a pylon within, and oversailing of, an active minerals site. Additionally, the crossing of the landfill and Buckingham Hill Road further south would require extremely tall pylons (both E12 extensions). On balance, the proposed alignment was preferred, noting that the overhead line broadly follows the existing gas pipeline within the Southfields site itself. The Applicant's position is that it has been engaging with representatives of the Southfields development since the first non-statutory consultation and prior to the site's identification as an Opportunity Area. In previous iterations of possible masterplans the Applicant has been advised of the lack of interaction and it is only recently that more extensive interface has been identified. The Applicant does not agree that the Project will impact the whole site and can provide examples where residential property safely co-exists within 30m or so of overhead lines. The alternative routes suggested present additional technical risks and are not preferred, with the impact transferring to other established aggregates businesses. The Applicant continues to engage with the developer to seek to agree a mutually agreed position. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
that the current land take is necessary. The Southfields scheme would deliver substantial housing and environmental benefits. The current alignment would prevent this, whereas the alternative alignment would allow both schemes to proceed. Seventyholds therefore requests that the alignment be amended to follow the alternative route.	of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have asserted that the Project will have a negative impact on the value of their property. Whilst the Applicant recognises that there will inevitably be some impact on property values arising from a project of this nature, the Applicant does not consider that this, of itself, provides grounds upon which the authorisation of CA and TP powers should be refused. It should be noted that the Applicant has in place a Voluntary Compensation Scheme for those residential properties affected by the Project and has issued guidance on what the scheme entails. Affected persons are directed to the Applicant's website for further information on the scheme. The Applicant also notes that a statutory blight scheme exists for those properties where there is a qualifying interest, and the Applicant has engaged and continues to engage with those affected persons who have asserted their interest in pursuing a blight claim.

Owners of qualifying agricultural properties who live within the agricultural unit may also benefit from the blight regime, subject to the satisfaction of the relevant criteria. The Applicant acknowledges that there is no statutory compensation for loss of value to dwellings arising from the use of a development (in this case the construction and/or operation of the Project). However, the Applicant has chosen to go beyond the statute and has in place a Voluntary Compensation Scheme for qualifying residential properties affected by the Project.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

[REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment. In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism, and traffic and transport. Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) [REP5-139], 7.3 Outline Construction Traffic Management Plan (Final Issue D) [REP5-149], 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) [REP5-157], Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) [REP5-161] and Outline Public Rights of Way Management Plan (Final Issue C) [REP5-163]. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to exploring appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

100. AP 100 - Henrietta Mary Guest

100.1 Person with Interest in Land (PIL) Reference ID: 2386

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The acquisition of rights over our land materially interferes with our ability to farm and the enjoyment that an owner should rightfully have over their land. We believe that as per section 123 subsection 4 we do believe that the prescribed procedure has been followed in relation to the land.	Summary of Objection The AP objects to (1) the impact the project has on the APs ability to farm, and an owner's right to enjoy their land, and (2) The procedures required by s123(4) have not been followed. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, occupation, and a right of Easement. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN in connection with this project over land in which this AP holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 7 (Powers of temporary possession). Consolidated Response With regard to the specific engagement with this AP, a Heads of Terms meeting was held on 28th May 2026 at which the Applicant discussed with the AP how they would continue to work the farm around the Project proposals. The AP advised that they produce blackcurrants, which take a long time to establish, and noted that the current proposals pass through the centre of the fruit crop. The Applicant acknowledges the significance of this concern and will continue to engage with the AP to explore appropriate mitigation options at the detailed design stage, including the positioning of infrastructure to minimise disruption to established crops where technically and constructively feasible.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Section 123(1) specifies that only one of the conditions set out in s123 need to apply at any one time. The application includes a request for the authorisation of compulsory acquisition in accordance with s123(2) which will be determined by the Secretary of State on the advice of the Examining Authority. In these circumstances the provisions of s123(4) do not need to be met. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response

(captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced-based and quantifiable submissions, with a view to attempting to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons -

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**: "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response

seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to exploring appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response

doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

101. AP 101 - Rex Webster and G Webster and Son Ltd

101.1 Person with Interest in Land (PIL) Reference ID: 5622, 7360

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed compulsory acquisition of land and rights affecting Flordon Hall and Farm on the basis that the Applicant has failed to demonstrate compliance with the requirements of Sections 122 and 123 of the Planning Act 2008 and the relevant guidance contained in the Department for Communities and Local Government's Planning Act 2008: The proposed acquisition of rights over Flordon Hall, Farm and tenanted properties would permanently interfere with established property rights, agricultural operations, estate management, and future use of the land. Such interference engages fundamental property rights and should not be authorised unless the Applicant demonstrates that the acquisition is necessary and proportionate. ECHR: Under Article 1 of Protocol 1 and Article 8 of the European Convention on Human Rights, the acquisition of rights over private land and the imposition of permanent restrictions must be shown to be necessary and proportionate. The Applicant has not	Summary of Objection The Applicant notes the objection raised by Rex Webster and G Webster and Son Ltd in relation to their land interests at Flordon Hall and Farm. The AP objects on the basis that the Applicant has (1) failed to demonstrate compliance with Sections 122 and 123 of the Planning Act 2008 and the relevant DCLG guidance. (2) The AP beleives that the proposed compulsory acquisition of rights over Flordon Hall, Farm and tenanted properties would permanently interfere with established property rights, agricultural operations, estate management, and the future use of the land. (3) The AP further beleives that the Applicant has not demonstrated that the rights sought have been reduced to the minimum necessary, and (4) failed to adequately explain why alternative routing, engineering solutions, reduced easement widths, or other less intrusive approaches could not be adopted. (5) Human rights grounds are also raised under Article 1 of Protocol 1 and Article 8 of the European Convention on Human Rights, with the AP contending that the Applicant has failed to balance fairly the public benefits of the Project and the prejudice suffered by the landowner. (6) The proposed works are said to have significant adverse impacts on agricultural productivity, farm business operations, landscape character, biodiversity, heritage interests and future development opportunities. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits (as per the Land Rights Tracker). The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead and underground infrastructure), Class 5 (access), The Applicant is seeking to acquire the following permanent rights for UKPN over land in which

Please summarise (in no more than 1500 words) the reason(s) for your objection

demonstrated that the rights sought over Flordon Hall and Farm have been reduced to the minimum necessary. Nor has it adequately explained why alternative routing, engineering solutions, reduced easement widths, or other less intrusive approaches could not be adopted. Without such evidence, the proposed acquisition cannot be regarded as the minimum interference necessary to deliver the project.

Section 123 PA 08 permits the compulsory acquisition of rights rather than land itself but this does not reduce the Applicant's burden of justification. The rights proposed over Flordon Hall and Farm would impose significant and enduring restrictions on ownership and occupation. The Applicant has not provided sufficient evidence that the rights sought have been carefully tailored to what is genuinely required for the project. For the purposes of Sections 122 and 123 of the Planning Act 2008 and the Department for Communities and Local Government Guidance on compulsory acquisition, the Applicant has failed to demonstrate:

- that the rights sought over Flordon Hall and Farm are strictly necessary;
- that the extent of the proposed acquisition has been minimised;

Applicant's Response

this AP holds an interest: (a) Class 3 (underground cable system) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

Regular engagement has been held with the APs representative, with the latest meetings being held on 26 May 2026 to discuss route alignment and siting and 12 June 2026 to continue discussions regarding construction and accommodation works. The Applicant continues to engage with the AP representative on HOTs negotiations.

The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors through the routing and siting of infrastructure. Effects on landscape receptors around Flordon Hall are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [Revision B]** under Landscape Character Area (LCA) B1 Tas Tributary Farmland (paragraphs 13.3.111 to 13.3.125) and LCA D1 Wymondham Settled Plateau Farmland (paragraphs 13.1.1 to 13.3.42). Significant effects are identified within approximately 1.5 km of the Project. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant effects on landscape character as stated above.

The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [Revision C]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
- that the interference with private property rights is proportionate; - that a fair balance has been struck between the public benefits of the project and the substantial prejudice suffered by the landowner. The proposed works would interfere materially with the ownership, occupation, management, enjoyment, and future use of Flordon Hall, Farm and tenanted properties. The proposed route would result in significant adverse impacts on agricultural productivity, farm business operations, landscape character, biodiversity, heritage interests and future development opportunities associated with Flordon Hall and Farm.	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 – Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 – Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their pre-construction condition. The matters raised in respect of Flordon Hall (1050698) and the farms: Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055) have previously been considered and addressed in 8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202], section 3; 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], section 9; and 8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028], pages 140–143. The Applicant has also responded regarding the assessment of groups of heritage assets and cumulative effects in ExQ2 HE2.3 of 8.9.2 Applicant's Responses to Second Written Questions [REP5-211], question 4 of 8.17 Response to Rule 17 Letter – Historic Environment [REP4-318], and ExQ1 HE1.8 of 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. The assessment of these assets was undertaken in accordance with the methodology set out

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	in 6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C], including reference to Historic England's GPA3 guidance on the Setting of Heritage Assets. The Applicant recognised the importance of the shared setting of Flordon Hall, the Piggery and the Barn, and assessed both the contribution of that setting to significance and the effects of the Project upon it. The Applicant's assessment was informed by walkover surveys, aerial and street-view imagery, and viewpoint assessment, including Historic Environment Viewpoint HE1. The assessment concluded that the intervening landscape, including buildings, copses and mature tree-lined hedgerows, interrupts and breaks up views towards the Project. The principal elevation of Flordon Hall faces east and its relationship and intervisibility with the Piggery and Barn would not be affected by the Project. The Applicant concluded in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B], and 6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D] that Flordon Hall would experience a moderate adverse significance of effect and Mid Less Than Substantial Harm during both construction and operation. The Piggery and Barn were assessed as experiencing moderate adverse significance of effect and Mid Less Than Substantial Harm during construction, reducing to minor adverse significance of effect and Lower Less Than Substantial Harm during operation. The Applicant considers that these conclusions are proportionate and appropriate and notes that Historic England agreed with the assessment of Flordon Hall in its Written Representation [REP1-191]. The Applicant also considered embedded mitigation through the design development process, including alternative alignments in the vicinity of Flordon Hall, and standard mitigation secured through the 7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G]. The Applicant concluded that additional mitigation measures would not materially alter the assessed effects and, given the level of harm identified and the application of the mitigation hierarchy, no further mitigation was considered necessary. The Applicant also considered alternative alignments in the vicinity of Flordon Hall as part of the design development process. As set out in 5.15 Design Development Report [APP-122], a localised diversion to the north-west between RG20 and RG22 was considered but would have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

required two additional angle pylons and was not taken forward. Moving the alignment to the east would take the route through woodland with various ecology concerns. Moreover, an alternative diversion to the west, between RG18/RG19 and RG24, was also considered but given blocks of woodland and a solar farm proposal, this required a longer route length and additional angle pylons, which is considered to be less compliant with the Holford Rules. The Applicant therefore considers that alternatives and embedded mitigation were appropriately considered during the design development process before the preferred alignment was identified.

The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in the submissions referenced above.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report – including appendices B to K (Final Issue A) [APP-296] and 6.20 Scoping Opinion (Final Issue A) [APP-297]. Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice [Revision G], 7.3 Outline Construction Traffic Management Plan [Revision F], 7.4 Outline Landscape and Ecological Management Plan [Revision G], 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C] and 7.6 Outline Public Rights of Way Management Plan [Revision D]. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

102. AP 102 - Katharine Elizabeth Allan

102.1 Person with Interest in Land (PIL) Reference ID: 3432

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed Compulsory Acquisition (CA), Compulsory Acquisition of rights, and Temporary Possession (TP) of my land and rights for the Norwich to Tilbury project. The Applicant has not demonstrated compliance with the statutory tests in Sections 122 and 123 of the Planning Act 2008, nor with the requirements of the DCLG Guidance (September 2013) on compulsory acquisition. 1. Section 122(2): The land has not been shown to be “required” for the development. Section 122(2) requires the Applicant to show that the land is required, necessary to facilitate, or incidental to the development. The DCLG Guidance (paras 11–13) stresses that the land take must be the minimum reasonably necessary and supported by clear evidence. The Applicant has not demonstrated why the full extent of the land and rights sought over my property are required. The scope of the proposed rights is excessive,	Summary of Objection The AP objects to the proposed compulsory acquisition, compulsory acquisition of rights, and temporary possession of her land and rights on the following grounds (1) The Applicant has not demonstrated compliance with the statutory tests in Sections 122 and 123 of the Planning Act 2008, nor with the requirements of the DCLG Guidance (September 2013) on compulsory acquisition (2) Section 122(2): The land has not been shown to be “required” for the development. (3) Section 122(3): No “compelling case in the public interest” and the Applicant has not demonstrated that the interference with my land and rights is proportionate (4) Section 123: Failure to attempt acquisition by agreement (5) Lack of clarity and justification for the rights sought. Insufficient assessment of alternatives. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response In relation to ongoing land negotiations, a Heads of Terms (HoTs) meeting was held on 28 May 2026, conducted through the AP's agent Grace Gardiner (Wilkes & Northwood), to run

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insufficiently justified, and not supported by plot-specific evidence. No adequate explanation has been provided as to why less intrusive alternatives—such as micro-siting, design adjustments, or alternative access arrangements—cannot be used. Without clear justification, the statutory test of necessity is not met. 2. Section 122(3): No “compelling case in the public interest” Section 122(3) requires the decision-maker to be satisfied that the public benefits clearly outweigh the private loss. The DCLG Guidance (paras 12–13, 17–19) emphasises that compulsory acquisition is a last resort and must be proportionate. The Applicant has not demonstrated that the interference with my land and rights is proportionate. The impacts on the use, enjoyment, and value of my land are significant, yet the Applicant has not provided sufficient detail on the nature, duration, or consequences of the proposed works. Without clear evidence that the public benefits outweigh the harm, the test of proportionality is not satisfied. 3. Section 123: Failure to attempt acquisition by agreement Section 123 requires the Applicant to show that it has made genuine attempts to acquire the land	through accommodation works. Discussions included how the AP will continue to work the farm around the proposals, with further time required to confirm crossing points and related matters. The Applicant notes that the AP produces blackcurrants, which take a long time to establish, and that the current proposals would pass through the centre of the AP's fruit crop. A further meeting is to be scheduled to continue discussions on accommodation works. In relation to the alignment and routeing of the overhead line, the alignment has been developed following an extensive, multi-stage routeing and siting process, informed by environmental assessment, engineering constraints, land use considerations and consultation feedback. Feedback provided throughout the development of the Project was responded to in the various consultation reports which can be found in 5.1 Consultation Report [APP-066] and associated appendices. The routeing of the Project is set out in the 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356], the Design Development Reports published during consultation [APP-358 to APP-360], and the Design Development Report submitted with the application for development consent (5.15 Design Development Report [APP-122]). A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
by agreement. The DCLG Guidance (paras 25–28) requires early, meaningful, and ongoing engagement. The Applicant has not engaged constructively with me. Communications have been limited, generic, and lacking in detail. No reasonable offer or explanation of the rights sought has been provided, nor has the Applicant demonstrated that voluntary agreements or reduced-impact alternatives have been explored. The statutory requirement for negotiation has not been met. 4. Lack of clarity and justification for the rights sought The Guidance (paras 13, 20–23) requires clear explanation of why each plot and each right is needed. The Applicant has not provided adequate detail on the extent, purpose, or duration of the rights sought, preventing proper assessment of their necessity or proportionality. 5. Insufficient assessment of alternatives The Applicant has not demonstrated that reasonable alternatives—route adjustments, engineering solutions, reduced land take, or temporary rather than permanent rights—have been properly considered, contrary to the Guidance (paras 13, 18, 21). Conclusion - The Applicant has not shown that the land is required, that the	to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
interference is necessary or proportionate, that a compelling case in the public interest exists, or that reasonable efforts have been made to acquire the land by agreement. The statutory tests in Sections 122 and 123 are not met, and I therefore object to the CA, CA of rights, and TP of my land.	Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1--138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

103. AP 103 - John Mather

103.1 Person with Interest in Land (PIL) Reference ID: 5872

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are hampered in making any arguments over any application by National Grid to acquire compulsory rights over our land since we don't know what exactly National Grid propose to do or how they propose to overcome any of the physical obstacles which the site presents since they do not engage with us and ignore representations we have made in responses to consultations etc. To be explicit, the site may ultimately require HDDing rather than trenching, but National Grid won't discuss this, although in one of their documents put out several years ago they did propose HDDing under the Blackbrook Stream at Langham and therefore under our land immediately to the south of the Blackbrook. However, they withdrew this plan without explanation or notice. We have attempted to query with National Grid at various stages including at an early stage how they plan to tackle the physical complications of laying cables under the undulating, hilly site including Blackbrook	Summary of Objection The AP objects on the basis that he has been unable to engage meaningfully with the Applicant regarding how the proposed route will overcome the physical obstacles on his site, including Blackbrook Hill, the Blackbrook Stream, and a high-pressure gas main. The AP has queried at various stages whether the Applicant proposes to use horizontal directional drilling (HDD) or open-cut trenching in this location, noting that the Applicant had previously proposed HDD under the Blackbrook Stream but withdrew that plan without explanation. The AP contends that any compulsory acquisition would be premature until the Applicant has made a final decision on its construction methodology in this location, as the rights required for trenching and HDD would need to be worded differently. The AP notes that he is willing to enter into a reasonable voluntary agreement and states that his land agents are in the process of attempting to agree Heads of Terms with the Applicant, though no agreement has been reached. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Restrictive Covenants. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

Hill, the Blackbrook Streaan, our land and the high-pressure gas main to the south but without response.

In view of the above, any attempt to seek compulsory rights would be premature until National Grid have made a final decision how to go about the laying of cables under our land, since it is assumed that rights to trench or alternatively HDD would have to be worded differently.

We have already communicated to National Grid that we are willing to enter into a reasonable agreement to grant them necessary and reasonable rights therefore compulsory action should be unnecessary. Our land agents are in the process of attempting to agree Heads of Terms with National Grid though there is no agreement at the moment.

Whether National Grid have taken all necessary prescribed steps before making any application(s) to compulsorily acquire rights over our land and considered all other options is a huge technical question given the size of the Norwich to Tilbury project and the amount of paperwork and information so far generated. I can't answer the point.

Applicant's Response

In relation to land negotiations, Version 2 Heads of Terms were issued on 26 March 2026. The Applicant remains in dialogue with the AP's agent (Nick Robinson) to negotiate the Heads of Terms, and remains committed to reaching a voluntary agreement. The most recent meeting was held on 4 June 2026, with revised terms to be issued shortly. The Applicant is aware of the issues raised by the AP from a site meeting and believes answers have been provided by the design team.

In relation to the proposed methodology for crossing Black Brook and the associated site constraints, the Applicant is proposing to undertake the crossing of Black Brook and the associated constraints in this area via open-cut trenching. As indicated on page 511 of **Application Document 8.4.1 Applicant's Response to Relevant Representations [REP2-023]**, the potential to cross Black Brook using trenchless techniques has been considered but it was concluded that with around 80m spacings between residential property and the veteran tree, there is insufficient space to accommodate Horizontal Directional Drilling, which needs cables (of which there are 18) to be separated by 10m to allow for directional variability. This requires an overall cable swathe of around 170m width compared with approximately 55m cable swathe for open-cut installation. The Applicant is aware of the significant constraints in this area including the gas pipeline, topography, overhead line and Black Brook itself, and is working with stakeholders to address these challenges. The Applicant has experience of installing cables through constrained locations and is confident that the approach proposed is viable. The Applicant will produce further detail at the detailed design stage of the Project and will continue to look for opportunities to minimise impacts at this pinch point crossing location.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

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Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively

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Applicant's Response

reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

104. AP 104 - Shelly Eliza Cockrell

104.1 Person with Interest in Land (PIL) Reference ID: 3787

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The land in question is woodlands that forms part of our estate that has been in our family for over 60 years. The amount of money that was offered to aquire this land was ridiculously low and we feel that, with the talks about the new estate that will be built on the land behind our property, it should be worth much more. Alternatively, if access to the land is needed to perform maintenance on the oversail, we are happy if the relevant organisation wishes to rent the land.	Summary of Objection The AP objects (1) The value offered for the rights sought (when compared with nearby residential development value) (2) the rights sought for maintenance – the AP would prefer to agree a rental arrangement. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure). Consolidated Response Following the issue of the V2 HOTs, The Applicant has offered the AP meetings to discuss the HOTs details. The APs representative details were obtained in June 2026 and continued engagement is currently underway. The Applicant acknowledges the Affected Person's view that the amount offered does not reflect the value they attribute to the woodland, particularly given its long-standing ownership by their family and their perception of its future development potential. The Applicant notes that compensation and acquisition terms remain subject to ongoing negotiation and any compensation payable would ultimately be assessed in accordance with the statutory compensation code. The statutory compensation framework provides for compensation based on established legal principles and takes account of the relevant circumstances of each case, and the need to reach agreements using the most economic and efficienct means of paying the appropriate compensation for the rights (which favours capital payments over long term

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

rental) The Applicant remains willing to continue discussions with the Affected Person and their representatives regarding the rights sought and the appropriate basis for compensation. In relation to the nature of the rights sought and the engagement with this AP, the Applicant clarifies that the rights being sought over the AP's land are for an overhead line option area only. The Applicant is not seeking to acquire the land itself, but rights for the overhead line option area. The value offered as part of those rights forms part of the Applicant's Land Rights Strategy. An offer of a meeting was made to the landowner on 6 March 2026 but no response was received from the AP.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the Project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the Project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources.

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

105. AP 105 - Colin Henry Smith (A H Smith & Sons)

105.1 Person with Interest in Land (PIL) Reference ID: 14506

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
High quality producing agricultural land which provides our main income to our farming business and has done for over 100 years.	Summary of Objection The AP objects on the basis that (1) the land in question is high-quality productive agricultural land, and (2) the main income for the farming business has come from the use of this land for more than a century. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Leasehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. During route optioneering, the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 – Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 – Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their pre-construction condition.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the Project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the Project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

106. AP 106 - Annabel Wood (JA Buntings and Sons)

106.1 Person with Interest in Land (PIL) Reference ID: 28603

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I strongly object to the proposed pylons being located on or affecting my land due to the significant visual, environmental, and property impacts. This proposal would cause unacceptable harm to my property rights, amenity, and the surrounding landscape.	Summary of Objection The AP objects to proposed pylons being located on, or affecting her land. Becasue (1) the AP is concerned about the significant visual, environmental, and property impacts from the proposed overhead line, and (2) the AP is concerned that the impacts will cause unacceptable harm to my property rights, amenity, and the surrounding landscape. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid and for UKPN in connection with the Project over land in which this AP holds an interest. The AP has an interest in plots E-1/56, E-1/69-70, E-1/72-73, E-1/77-81, E-1/83-89, E-2/12, E-2/15-16, E-2/19-20, E-2/26-29, E-2/31, E-2/33, E-2/41, E-2/44, E-2/75, E-2/77. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors through the routeing and siting of infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant effects on landscape character and visual amenity as reported in the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 – Landscape and Visual [Revision B]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations.

It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction to provide a more detailed understanding of the time when any construction works will take place.

The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the Project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the Project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources.

The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

107. AP 107 - Paul Charles Peter Wenden

107.1 Person with Interest in Land (PIL) Reference ID: 2022

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I see no reason why the project needs to infringe my property as it could be moved eastwards to avoid me completely	Summary of Objection The AP objects on the basis that the Project could be moved eastwards, and the result of this change would be to avoid his property entirely. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. Subsoil interest. Consolidated Response The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. In relation to the detailed position of the Order Limits in the vicinity of the AP's land, the Applicant notes that there is a highway visibility splay, as shown on the draft Order Plans, which is positioned to the south of the public highway. The Order Plans show the visibility splay extending into the highway boundary. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide a highways compliant access. The Applicant acknowledges that there appear to be some discrepancies between the public highway boundary as recorded in the Land Registry and the position as shown on the Ordnance Survey base map used in the draft Order Plans. For the sake of clarity the Applicant is not seeking to compulsorily acquire land within the highway, (which is presumably already vested in the relevant highway authority) nor is it seeking to access private gardens or remove vegetation within someone's private garden. In relation to the consideration of alternatives in the vicinity of the AP's land, the Applicant has considered alternative routeing and would note that alternatives further east would transfer effects to other receptors or may lead to more costly alternatives. The alignment has been developed following an extensive, multi-stage routeing and siting process, informed by

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

environmental assessment, engineering constraints, land use considerations and consultation feedback. Feedback provided throughout the development of the Project was responded to in the various consultation reports which can be found in 5.1 Consultation Report **[APP-066]** and associated appendices. The routeing of the Project is set out in the 7.18 2022 – Corridor and Preliminary Routeing and Siting Study **[APP-356]**, the Design Development Reports published during consultation **[APP-358 to APP-360]**, and the Design Development Report submitted with the application for development consent (5.15 Design Development Report **[APP-122]**).

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

108. AP 108 - Donna Wenden

108.1 Person with Interest in Land (PIL) Reference ID: 3080

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
No need to use the land	Summary of Objection The AP objects on the basis that the Applicant has not demonstrated a need to use her land for the purposes of the Project. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold subsoil interest. Consolidated Response The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. In relation to the detailed position of the Order Limits in the vicinity of the AP's land, the Applicant notes that there is a highway visibility splay, as shown on the draft Order Plans, which is positioned to the south of the public highway. The Order Plans show the visibility splay extending into the highway boundary. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide a highways compliant access. The Applicant acknowledges that there appear to be some discrepancies between the public highway boundary as recorded in the Land Registry and the position as shown on the Ordnance Survey base map used in the draft Order Plans. For the sake of clarity, the Applicant is is not seeking to compulsorily acquire land within the highway, (which is presumably already vested in the relevant highway authority), nor is it seeking to access private gardens or remove vegetation within someone's private garden. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

109. AP 109 - Christopher Philpot (CJH Holdings Ltd)

109.1 Person with Interest in Land (PIL) Reference ID: 10457

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
CJH Farming does not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. Compulsory acquisition is unnecessary. The company has engaged fully with National Grid (NG) and has never had any direct response to any questions raised and therefore can honestly say that we do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. One feels that every meeting I have held with Fisher German has just been a tick box exercise for National Grid so the affected land owner can explain the situation on the ground but then none of this information ACTUALLY gets back to NG and actioned, proof that the applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. CJH Farming is seriously concerned that the rights being sought may be wider than	Summary of Objection The AP objects to the proposed compulsory acquisition on multiple grounds:- (1) that the exercise of compulsory acquisition powers over his land is not in the public interest and that there has been a failure of adequate engagement with him, (2) the extent of the rights sought, including those over an extensive area of land (in excess of 1,000 acres in total across his family's holdings) is disproportionate and unjustified; (3) the Heads of Terms are unacceptable and unreasonable, (4) the impact of the Project on his land has not been minimised, (5) there are specific concerns about the proposed siting of pylons TB154–157, which are positioned so as to restrict access and use of his land and interact with an existing solar farm proposal and a minerals safeguarding area, Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

necessary for the scheme - NG want to have Rights over my affected EX number - this EX number for this 'project' covers over 1,000 acres - I can't have NG controlling what happens on the entire holding - that's not fair and needs to be conceded by NG in the draft Heads of Terms.

The Heads of Terms are still not in a reasonable or acceptable format. Why can't NG be 'reasonable' rather than being so stubborn and never conceding anything - or agreeing to a practical solution. It's just wasting everyone's time and winding people up unnecessarily. In summary, the current Heads of Terms impose unfair and unreasonable restrictions on landowners.

CJH Farming do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary, proportionate, or limited to what is reasonably required.

In summary I wish to make it clear that CJH Farming objects to the compulsory acquisition of our land and rights unless and until the Applicant can properly justify the powers sought, reduce the impact on our holding, and agree reasonable terms and protections.

Applicant's Response

In relation to ongoing land negotiations, discussions are progressing with the AP's agent (Birketts/Savills) regarding access, crossing points, proposed compound locations and haul road arrangements. A further meeting is scheduled for July 2026 to continue these discussions. The Applicant remains committed to reaching a voluntary agreement and will continue to engage with the AP and his representatives.

In relation to the specific construction matters raised by the AP, the Applicant confirms that the proposed haul road in this location will be accessed over a bridleway, as confirmed by Essex County Council. The Applicant further confirms that access for the purposes of the Essex Young Farmers Club Show will be maintained during construction, and that no vehicles or materials associated with the Project will be stacked at the bellmouth from the A1060 in a manner which would obstruct the AP's access to or from that road.

In relation to Heads of Terms, the Applicant notes that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

110. AP 110 - CJH Holdings Ltd

110.1 Person with Interest in Land (PIL) Reference ID: 10457

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
CJH Holdings does not consider the compulsory acquisition of our land and rights to be in the public interest, particularly where reasonable alternatives are available. Compulsory acquisition is unnecessary. The company has engaged fully with National Grid (NG) and has never had any direct response to any questions raised and therefore can honestly say that we do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on our holding. One feels that every meeting I have held with Fisher German has just been a tick box exercise for National Grid so the affected land owner can explain the situation on the ground but then none of this information ACTUALLY gets back to NG and actioned, proof that the applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. CJH Holdings is seriously concerned that the rights being sought may be wider than	Summary of Objection The AP objects to the proposed compulsory acquisition on multiple grounds:- (1) that the exercise of compulsory acquisition powers over his land is not in the public interest and that there has been a failure of adequate engagement with him, (2) the extent of the rights sought, including those over an extensive area of land (in excess of 300 acres in total across his family's holdings) is disproportionate and unjustified; (3) the Heads of Terms are unacceptable and unreasonable, (4) the impact of the Project on his land has not been minimised, (5) there are specific concerns about the proposed siting of pylons TB154–157, which are positioned so as to restrict access and use of his land and interact with an existing solar farm proposal and a minerals safeguarding area,(6) the Access road will impact the Essex YFC Showground, and there is a satisfactory alternative to this access. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

necessary for the scheme - NG want to have Rights over my affected EX number - this EX number for this 'project' covers over 300 acres - I can't have NG controlling what happens on the entire holding - that's not fair and needs to be conceded by NG in the draft Heads of Terms.

I am very concerned that NG are wanting access rights through the Essex YFC Show field. This is completely unacceptable and we have tried to tell NG this on a number of occasions. This must not be allowed to happen - there is a perfectly acceptable access directly off the A1060 which was proposed until very recently and I don't understand why the longer route was more recently proposed. We have been assured that this route will not be used or put in the final document - let's see what happens...

The Heads of Terms are still not in a reasonable or acceptable format. Why can't NG be 'reasonable' rather than being so stubborn and never conceding anything - or agreeing to a practical solution. It's just wasting everyone's time and winding people up unnecessarily. In summary, the current Heads of Terms impose unfair and unreasonable restrictions on landowners.

CJH Holdings do not consider that the Applicant has demonstrated that the interference with our land and rights is necessary, proportionate, or limited to what

Applicant's Response

In relation to ongoing land negotiations, discussions are progressing with the AP's agent (Birketts/Savills) regarding access, crossing points, proposed compound locations and haul road arrangements. A further meeting is scheduled for July 2026 to continue these discussions. The Applicant remains committed to reaching a voluntary agreement and will continue to engage with the AP and its representatives.

In relation to the specific construction matters raised by the AP, the Applicant confirms that the proposed haul road in this location will be accessed over a bridleway, as confirmed by Essex County Council. The Applicant further confirms that access for the purposes of the Essex Young Farmers Club Show will be maintained during construction. The Applicant further clarifies that no bellmouth stacking is proposed as part of the access arrangements from the A1060, as shown on Page 50 of **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**. Page 50 of **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design – Permanent Features [REP4-110]** further illustrates that no permanent haul roads are proposed in the vicinity of the A1060. This is reflected in the Land Plans presented by the Applicant, with this area shown in Sheet 7 of **2.2 Land Plans – Section F [AS-010]**.

In relation to Heads of Terms, the Applicant notes that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
is reasonably required. In summary I wish to make it clear that CJH Holdings objects to the compulsory acquisition of our land and rights unless and until the Applicant can properly justify the powers sought, reduce the impact on our holding, and agree reasonable terms and protections.	issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

111. AP 111 - Abdul Azeem Dhillon

111.1 Person with Interest in Land (PIL) Reference ID: 24283

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must	Summary of Objection The AP objects on (1) the interaction and conflict between the Norwich to Tilbury Project and the Lower Thames Crossing ("LTC") project. (2) there has been a lack of transparency regarding how the two projects interact with one another and (3) that plans previously communicated to the AP were subsequently changed without adequate communication or explanation. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to compulsorily acquire land (Class 1) and to exercise powers of temporary possession (Class 7), together with Class 8 ("white land") powers, over land in which this AP holds an interest in connection with the Project. Consolidated Response The Applicants representative has reached out to the AP to continue negotiations, following a door knock attempt by the AP, it was noted that the AP was looking to instruct a representative. The Applicant will be in contact with the AP to further negotiations. The applicant has undertaken an assessment of the likely cumulative effects that may arise from the Norwich to Tilbury Project and the LTC project. This is presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects (Final Issue A) [APP-284] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Final Issue B), under ID DCO3 (Lower Thames Crossing). The cumulative affects assessment concluded that there are likely to be significant adverse cumulative effects on landscape and visual receptors during both construction and operation (and maintenance) phases, significant cumulative effects curing construction and operation (and maintenance)

Please summarise (in no more than 1500 words) the reason(s) for your objection

object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.

Applicant's Response

phases on agriculture and soils due to the extent of high-quality agricultural land required, and minor cumulative effects on heritage assets due to the realignment and restringing of existing overhead lines which are not significant. In relation to the timing of the interface between this Project and the LTC, the Applicant confirms that it is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities. The Applicant will continue to liaise with the LTC project as both projects develop and will take all reasonable steps to provide mitigation to affected persons in relation to any cumulative effects arising. The applicant does not agree that any changes to the proposals have not been communicated to affected parties. Alongside individual engagement with APs a number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

112. AP 112 - Abdul Aleem Dhillon

112.1 Person with Interest in Land (PIL) Reference ID: 24284

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due	Summary of Objection The AP objects on the same grounds as AP 111 above, namely the interaction and conflict between the Norwich to Tilbury Project and the Lower Thames Crossing project, the lack of transparency regarding how the two projects interact, and the fact that plans previously communicated to the AP were subsequently changed without adequate communication or explanation. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to compulsorily acquire land (Class 1) and to exercise powers of temporary possession (Class 7), together with Class 8 ("white land") powers, over land in which this AP holds an interest in connection with the Project. The Applicants representative has reached out to the AP to continue negotiations, following a door knock attempt by the AP, it was noted that the AP was looking to instruct a representative. The Applicant will be in contact with the AP to further negotiations. Consolidated Response The Applicant's response to the issues raised by this AP is the same as that set out above in relation to AP 111 (Abdul Azeem Dhillon). In particular, the Applicant has undertaken a detailed assessment of the cumulative effects of this Project and the Lower Thames Crossing project in the Environmental Statement, has identified appropriate mitigation measures in the relevant environmental management plans, and is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
communication with us, therefore, I must object to this scheme and ask the planning inspectorate to redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	The applicant has undertaken an assessment of the likely cumulative effects that may arise from the Norwich to Tilbury Project and the Lower Thames Crossing. This is presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects (Final Issue A) [APP-284] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Final Issue B), under ID DCO3 (Lower Thames Crossing). The cumulative effects assessment concluded that there are likely to be significant adverse cumulative effects on landscape and visual receptors during both construction and operation (and maintenance) phases, significant cumulative effects during construction and operation (and maintenance) phases on agriculture and soils due to the extent of high-quality agricultural land required, and minor cumulative effects on heritage assets due to the realignment and restringing of existing overhead lines which are not significant. The Applicant confirms that it is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities, and will continue to liaise with the LTC project as both projects develop. The Applicant does not agree that APs have not been advised where there have been changes in plans / design. Alongside side individual engagement with APs there have been several rounds of consultation. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

113. AP 113 - Abdul Samad Dhillon

113.1 Person with Interest in Land (PIL) Reference ID: 24285

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must	Summary of Objection The AP objects on the same grounds as APs 111 and 112 above, namely the interaction and conflict between the Norwich to Tilbury Project and the Lower Thames Crossing project, the lack of transparency regarding how the two projects interact, and the fact that plans previously communicated to the AP were subsequently changed without adequate communication or explanation. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to compulsorily acquire land (Class 1) and to exercise powers of temporary possession (Class 7), together with Class 8 ("white land") powers, over land in which this AP holds an interest in connection with the Project. Consolidated Response The Applicants representative has reached out to the AP to continue negotiations, following a door knock attempt by the AP, it was noted that the AP was looking to instruct a representative. The Applicant will be in contact with the AP to further negotiations. The AP objects on the same grounds as APs 111 and 112 above, namely the interaction and conflict between the Norwich to Tilbury Project and the Lower Thames Crossing project, the lack of transparency regarding how the two projects interact, and the fact that plans previously communicated to the AP were subsequently changed without adequate communication or explanation. The applicant does not agree that any changes to the proposals have not been communicated to affected parties. Alongside individual

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.	engagement with APs the Project has been through several stages of public and targeted consolation. The Applicant's response to the issues raised by this AP is the same as that set out above in relation to APs 111 and 112. In particular, the Applicant has undertaken a detailed assessment of the cumulative effects of this Project and the Lower Thames Crossing project in the Environmental Statement, has identified appropriate mitigation measures in the relevant environmental management plans, and is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities. The applicant has undertaken an assessment of the likely cumulative effects that may arise from the Norwich to Tilbury Project and the LTC project. This is presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects (Final Issue A) [APP-284] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Final Issue B), under ID DCO3 (Lower Thames Crossing). The cumulative affects assessment concluded that there are likely to be significant adverse cumulative effects on landscape and visual receptors during both construction and operation (and maintenance) phases, significant cumulative effects curing construction and operation (and maintenance) phases on agriculture and soils due to the extent of high-quality agricultural land required, and minor cumulative effects on heritage assets due to the realignment and restringing of existing overhead lines which are not significant. The Applicant confirms that it is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities, and will continue to liaise with the LTC project as both projects develop. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

114. AP 114 - Nasim Akhtar Dhillon

114.1 Person with Interest in Land (PIL) Reference ID: 24286

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This proposal being part of a major infrastructure project conflicts with the major infrastructure project of LTC as the proposals by LTC will result in major changes around our land including new road layout as part of the scheme. It is my view that there has been no transparency in terms of looking at the link up between these two projects and the link up of the LTC project will conflict with the tasks being proposed that will impact as a result of the Norwich and Tilbury project. It is my view that if there is a requirement for even temporary disturbance then this should be based upon clear transparency and evaluating the facts which sadly have not been forthcoming and I have had no explanations as to why there should be land utilisation/ disturbance upon our site. The last thing we need is a big hotchpotch of one project doing one thing, and the other project doing another. The previous plans were not to have any impact on or near our site and these have also been changed without due communication with us, therefore, I must	Summary of Objection The AP objects on the same grounds as APs 111, 112 and 113 above, namely the interaction and conflict between the Norwich to Tilbury Project and the Lower Thames Crossing project, the lack of transparency regarding how the two projects interact, and the fact that plans previously communicated to the AP were subsequently changed without adequate communication or explanation. The applicant does not agree that any changes to the proposals have not been communicated to affected parties. Alongside individual engagement with APs the Project Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to compulsorily acquire land (Class 1) and to exercise powers of temporary possession (Class 7), together with Class 8 ("white land") powers, over land in which this AP holds an interest in connection with the Project. The Applicants representative has reached out to the AP to continue negotiations, following a door knock attempt by the AP, it was noted that the AP was looking to instruct a representative. The Applicant will be in contact with the AP to further negotiations. Consolidated Response The Applicant's response to the issues raised by this AP is the same as that set out above in relation to APs 111, 112 and 113. In particular, the Applicant has undertaken a detailed assessment of the cumulative effects of this Project and the Lower Thames Crossing project in the Environmental Statement, has identified appropriate mitigation measures in the

Please summarise (in no more than 1500 words) the reason(s) for your objection

object to this scheme and ask the planning inspectorate the redress the balance without the need for such services to require compulsory acquisition/ utilisation of our land.

Applicant's Response

relevant environmental management plans, and is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities.

The applicant has undertaken an assessment of the likely cumulative effects that may arise from the Norwich to Tilbury Project and the LTC project. This is presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects (Final Issue A) **[APP-284]** and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update (Final Issue B), under ID DCO3 (Lower Thames Crossing). The cumulative effects assessment concluded that there are likely to be significant adverse cumulative effects on landscape and visual receptors during both construction and operation (and maintenance) phases, significant cumulative effects during construction and operation (and maintenance) phases on agriculture and soils due to the extent of high-quality agricultural land required, and minor cumulative effects on heritage assets due to the realignment and restringing of existing overhead lines which are not significant.

The Applicant confirms that it is working collaboratively with the LTC project team to manage the interface between the two projects, including in relation to programme and the sequencing of respective construction activities, and will continue to liaise with the LTC project as both projects develop.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

115. AP 115 - Charles Tritton

115.1 Person with Interest in Land (PIL) Reference ID: 4814

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure) (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

116. AP 116 - Diana Tritton

116.1 Person with Interest in Land (PIL) Reference ID: 6852

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. Land Rights Sought The Applicants understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that the AP is represented by agents (Strutt & Parker) and that detailed representations concerning the Lyons Hall Estate holdings were submitted to the Examining Authority at Compulsory Acquisition Hearing 2 (CAH2). The Applicant's land team (Fisher German) is aware of the comments and concerns raised as part of those CAH2 representations and is engaging with the AP's agents accordingly. Specific matters relating to the routing of the Project through this estate, the extent of the rights sought, and the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

proposed accommodation works will continue to be addressed through ongoing engagement.

In relation to the routeing and siting of the Project through the Lyons Hall Estate area, the Applicant confirms that alternatives were considered in detail during the routeing and siting process, including consideration of whether the route could interact with an existing permitted minerals site in this area. The alignment has been developed following an extensive, multi-stage routeing and siting process, informed by environmental assessment, engineering constraints, land use considerations and consultation feedback. The routeing of the Project is set out in the 7.18 2022 – Corridor and Preliminary Routeing and Siting Study **[APP-356]**, the Design Development Reports published during consultation **[APP-358 to APP-360]**, and the Design Development Report submitted with the application for development consent (5.15 Design Development Report **[APP-122]**).

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project

117. AP 117 - MRS PRISCILLA VICTORIA LATHAM

117.1 Person with Interest in Land (PIL) Reference ID: 8638

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Plots (The land and roads around my house (Manor Farmhouse, Diss Road Tibenham, NR16 1QF) which fronts Diss Road and has Mill Road forming the boundary on the west. I have been unable to access the Book of Reference online to provide the plot numbers.) I object to the access proposals for the construction of the proposed route of the pylons which runs within 300 metres to the east of our land on several grounds: • The roads in front of and to the east of the house are far too narrow to cope with the size of the construction vehicles necessary for such a major development. They will inevitably damage the verges, ditches and hedgerows with potential irreversible damage to our hedgerow trees if they are damaged due to over sized vehicles pushing past them. Or being cut back by contractors to facilitate access without our permission which we are highly unlikely to grant.	Summary of Objection The AP objects on a number of specific grounds relating to the impact of construction works on her residential property and the surrounding area. In particular, the (1) AP raises concerns that the access road adjacent to her property is too narrow to accommodate the size of construction vehicles and equipment that will be required, and that road closures arising from construction activities will significantly impact her ability to access her property. (2) The AP also expresses concern that her property will be effectively surrounded by construction works, causing unacceptable levels of noise and disruption. (3) The AP raises specific concerns about the impact of construction on protected wildlife species found on and around her land, including great crested newts, slow worms and grass snakes, which she has observed on the site. (4) The AP also raises concern that the Project will make her property difficult or impossible to sell. Land Rights Sought The Applicant understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold subsoil interest. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). Consolidated Response In relation to ecological matters, the Applicant has undertaken a careful design process that has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 -

Please summarise (in no more than 1500 words) the reason(s) for your objection

- Access to our home is will be seriously effected by road closures meaning circuitous routes greatly increasing the mileage incurred during the course of routine daily life.
- Our house and garden will effectively on surrounded by construction access routes and the actual line of the pylons - our right of access will be infringed.
- The noise and constant activity of heavy construction taking place over a period of months will be detrimental to the natural environment. The wildlife which is abundant here will be adversely effected - reptiles such as Great Crested Newts, Slow Worms and Grass Snakes all of which breed in our garden and the ditches/ponds immediately around us will undoubtedly be impacted by the construction.
- In the lead up to construction work, and for its duration any possibility of selling our property with a view to downsizing which is planned in the relatively near future will be impossible without a major reduction in the value.

Applicant's Response

Ecology and Biodiversity [Revision C] assesses the effects on important ecological receptors including reptiles (including slow worm and grass snake) and amphibians. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have Inform the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

In relation to construction access and traffic in the vicinity of the AP's property, the Applicant confirms that construction traffic associated with the Project will not use the road immediately outside the AP's property, nor will it use Mill Road. Mill Road has a crossover bellmouth location proposed, where construction vehicles will cross the public highway and continue to travel on the Haul Road. Construction traffic is unable to join the haul road from crossover bellmouth locations, except in specific circumstances detailed in **7.3 Outline Construction Traffic Management Plan [Revision F]**. Diss Road is noted as a proposed diversion route for background traffic, with the temporary road closures of Mill Lane and Blackburn Road, but this will not be a construction traffic diversion. The timings of the diversion routes and road closures will be managed by the Permit Scheme hosted by Norfolk County Council, and it is not expected that these road closures be in place simultaneously, and access to the property will be maintained throughout construction. The Applicant will continue to work with the AP to ensure that construction activities in the vicinity of her property are managed in a way that minimises disruption as far as possible.

The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

In relation to the concern raised regarding the impact of the Project on the value of the AP's property, the Applicant notes that the Compensation Code provides a mechanism through which property owners may seek compensation where the value of their property is demonstrably affected by the carrying out of authorised works. The Applicant refers the AP to the relevant statutory provisions in this regard, including the Land Compensation Act 1973. The Applicant is not in a position to provide specific advice on individual compensation claims, but notes that the AP would be entitled to seek independent professional advice on her position.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons – Appendix A – Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report – including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in **7.4 Outline Landscape and Ecological Management Plan [Revision G]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan **[Revision G]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

118. AP 118 - Alan Tritton (Lyons Hall Estate)

118.1 Person with Interest in Land (PIL) Reference ID: 8289

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP Land Rights Sought Although no detail has been provided with this objection, it is the Applicants understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that the AP holds land as part of the Lyons Hall Estate and is represented by agents (Strutt & Parker). Detailed representations concerning the Lyons Hall Estate holdings were submitted to the Examining Authority at Compulsory Acquisition Hearing 2 (CAH2). The Applicant's land team (Fisher German) is aware of the comments and concerns raised as part of those CAH2 representations and is engaging with the AP's agents accordingly. Specific matters relating to the routing of the Project through the Lyons Hall Estate, the extent of the rights sought, and the proposed accommodation works will continue to be addressed through ongoing engagement between the parties.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project

119. AP 119 - James Morris

119.1 Person with Interest in Land (PIL) Reference ID: 7480

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Objection

No written reasons for objection have been provided by the AP

Land Rights Sought

Although no detail on this objection has been provided, it is the Applicants understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant notes that no communications have been received from this landowner and that the AP has not made any specific representations regarding the content of the submitted objection. The Applicant has not, therefore, been in a position to engage directly with the AP regarding their specific concerns. The Applicant remains willing to engage with the AP and their representatives should they wish to do so and invites the AP to make contact with the Applicant's land team (Fisher German) to discuss the Project and the land rights sought.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

120. AP 120 - Tritton Farming Partnership LLP

120.1 Person with Interest in Land (PIL) Reference ID: 14063

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP Land Rights Sought Although no detail has been provided with this objection it is the Applicants understands that the Affected Person's ("AP") objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation, Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that the AP holds interests as part of the Lyons Hall Estate farming partnership and is represented by agents, Strutt & Parker. Whilst no specific written reasons for objection have been provided by this AP, detailed representations concerning the Lyons Hall Estate holdings were submitted to the Examining Authority, including at Compulsory Acquisition Hearings 2 and 3. The Applicant's land team (Fisher German) continues to engage actively with the AP's agents regarding the routing of the Project, the extent of the rights sought and accommodation works. In particular, discussions regarding the alternative alignment referred to as "Scenario B", which would relocate a section of the proposed

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

overhead line infrastructure, have progressed positively and, as reported at CAH3, agreement in principle has been reached between the parties on that option, subject to the completion of the necessary design development, legal documentation and associated agreements. The Applicant therefore considers that constructive engagement is continuing and that a number of the matters previously raised by the Lyons Hall Estate are being actively addressed through ongoing negotiations. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

121. AP 121 - David Lewis

121.1 Person with Interest in Land (PIL) Reference ID: 1997

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP Land Rights Sought Although no detail has been provided with this objection, it is the Applicants understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. The AP has interest in plots D-3/104-105, D-4/1-9, D-4/18-19 Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. Version 2 Heads of Terms ("HoTs") were issued on 26 March 2026. The Applicant's agent met with the landowner and their agent on 19 May 2026 to discuss the HoTs, and the Applicant remains committed to agreeing voluntary terms with the AP. Following a subsequent meeting with the AP's agent, the grantor's land has been reduced and this will be reflected in the subsequent re-issue of terms. The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

122. AP 122 - Stephen Knight, Stanfords LLP

122.1 Person with Interest in Land (PIL) Reference ID: 25434

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object on behalf of Gent Fairhead & Co Limited, and Blackwater Aggregates to the alignment of the proposed overhead cables and pylons. The Scheme is proposed to pass through Monks Farm, Kelvedon which is subject to the terms of an Option Agreement for mineral extraction in my clients favour. It is National Grids intention to locate pylons TB083 and TB084 in the centre of Monks Farm, which will sterilise significant mineral reserves. Whilst Monks Farm is not yet identified within the Minerals Local Plan, it was submitted to Essex County Council in July 2024 for the purposes of their Mineral Local Plan Review, which is currently under consultation. I have been in discussion with National Grid representatives regarding the route alignment, and we are yet to receive confirmation that the route will re-aligned to the south, closer to the red line application area to help mitigate the sterilisation.	Summary of Objection The AP objects on behalf of Gent Fairhead & Co Limited and Blackwater Aggregates to the alignment of the proposed overhead cables and pylons. In particular, the AP objects to (1) Pylons TB 083 and TB 084 which are expected to sterilise significant mineral reserves if the Option is exercised and the site becomes part of the County minerals supply, (noting that the Mineral Reserves are not yet in the Essex Mineral Local Plan, but have been submitted in July 2024 as part of the Mineral Local Plan Review), and (2) the AP beleives the route could be realigned to the south, closer to the red line application area, to help mitigate the sterilisation. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege and Option to Purchase. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

In relation to the specific concerns raised about the conflict between the proposed route and the proposed area of mineral extraction, the Applicant notes that due to the identified route conflict between Blackwater Aggregates' proposed area of mineral extraction and the proposed adjacent housing development being undertaken by the freeholder Parkers of Leicester, an alternative alignment within the Limits of Deviation ("LoD") is currently being developed which would minimise impact on the minerals site. This route would be positioned between the edges of both the minerals site and the housing development site to better accommodate both parties' interests. The Applicant will engage with Blackwater Aggregates and Parkers of Leicester through detailed design to further refine and confirm the alignment. Wider alternatives to the north are unviable as they would cross existing minerals sites, lead to increased heritage effects between connected mediaeval features (Grade I and II*) and more generally transfer effects. Likewise, alternatives further to the south would impact further residential properties and impact to a greater degree on proposed residential developments.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

123. AP 123 - Matthew Bunting

123.1 Person with Interest in Land (PIL) Reference ID: 28603, 15478

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Because it would cut our land completely in half and would for ever cause obstruction. Would also create a blot on the landscape of the farm.	Summary of Objection The AP objects on the basis that the proposed infrastructure would (1) cut their land completely in half, (2) creating a permanent obstruction, and (3) would be a visual blot on the landscape of the farm. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits, Category 1 – Freehold..The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure) (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTS negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors through the routeing and siting of infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

significant effects on landscape character and visual amenity as reported in the Landscape and Visual Impact Assessment in **6.13 Environmental Statement Chapter 13 – Landscape and Visual [Revision B]**. In relation to the AP's specific concern about the overhead line cutting through their land and creating what they describe as an obstruction, the Applicant does not agree that the introduction of this infrastructure creates a barrier to movement, and does not consider that it constitutes severance in the legal sense either.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

124. AP 124 - Derek Boreham

124.1 Person with Interest in Land (PIL) Reference ID: 27008

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my land is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my land.	Summary of Objection The AP objects on a number of grounds. In summary: (1) the AP asserts that National Grid has failed to demonstrate that the full extent of the rights sought over their land is genuinely necessary for the purposes of Section 122(2) of the Planning Act 2008, contending that the powers sought appear wider than reasonably required and have not been sufficiently justified; (2) the AP raises similar concerns in relation to Section 122(3) of the Planning Act 2008; (3) the AP contends that the Section 123 procedural test has not been met; and (4) the AP asserts non-compliance with the MHCLG 2013 Guidance on compulsory acquisition. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Leasehold and Occupation. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response In relation to the AP's concerns about agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities and operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 – Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3)

Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected landowners. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my land rights is justified or proportionate.

3. Disproportionate Impact on My Agricultural Holding

The proposed rights and associated powers would adversely affect the efficient operation of my agricultural holding. Their exercise has the potential to disrupt farming activities, restrict access for agricultural machinery, interfere with field operations and reduce the flexibility with which the land can be managed. As an agricultural business, the cumulative effect of these restrictions extends beyond the area directly affected and has implications for the efficient and economic operation of the holding as a whole. I do not consider that National Grid has adequately demonstrated that these impacts have been minimised or that the least intrusive solution has been adopted.

Applicant's Response

Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my land and agricultural operations. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my land. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects	explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

the peaceful enjoyment of possessions. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my agricultural land and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant acknowledges that the compulsory acquisition of rights over the Affected Party's land engages Article 1 of the First Protocol (A1P1) to the European Convention on Human Rights, and the Examining Authority will recall that this was confirmed in the Applicant's responses to the Examining Authority agenda item 6 at CAH1, and in written submissions following that hearing. Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

The Applicant has established the need for the project in accordance with the requirements of section 3.3 of the National Policy Statement (NPS) EN-1 (November 2023), and Section 2.6 of National Policy Statement (NPS) EN-5, which addresses specifically the matters to be considered in respect of Land Rights and Land Interests in the delivery of Nationally Significant Infrastructure Projects.

With respect to demonstrating the compelling case in the public interest, as it is relevant under the requirements of A1P1, the Applicant's position is that has discharged obligations in this regard by being able to demonstrate:

- That the rights being sought are the minimum rights necessary to deliver and maintain the project (for example, the use of easement and temporary possession rather than freehold acquisition where possible, defining (as far as possible at this stage in the scheme's development and design evolution) working spaces, widths, reinstatement proposals etc.
- That alternative options to those which are the subject of this Examination have been explored comprehensively and it can be demonstrated that on the balance of all matters that have been considered, that routing and alignment options in this area have been

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Applicant's Response

reviewed and where possible changes made in response to consultation responses and feedback.

- The impacts on the agricultural operations at this location can be minimised, and the Applicant will seek to continue to engage with the Affected Party to inform the development of measures and protocols such as the Code of Construction Practice, etc).
- Any interference in respect of the provisions of A1P1 is further addressed by the statutory compensation regime under the Compulsory Purchase Compensation Code, which ensures the Affected Party is placed, so far as is possible, in no worse a financial position than had the acquisition not occurred.

On this basis, the Applicant submits that the fair balance required by A1P1 is achieved, and that the interference with the Affected Party's rights is proportionate to the legitimate public interest in delivery of the Project.

125. AP 125 - Mark Easton

125.1 Person with Interest in Land (PIL) Reference ID: 10198

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Since the consultation period I believe there has been little or no consideration that given to alternative routes or design changes to lessen the impact to our area. Giving NG a blanket policy to obtain compulsory rights seems completely disproportionate and without regard to what they might actually need. They could put in place compulsory powers for their own convenience or just to keep flexibility to change things sometime in the future without consulting anyone.	Summary of Objection The AP objects on the basis that:-(1) Since the consultation period there has been little or no consideration given to alternative routes or design changes to lessen the impact, and (2) Compulsory acquisition rights are disproportionate to NG's needs and potentially could provide excessive rights for NG. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure) and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant can confirm that it has been actively engaged with this AP in seeking to reach voluntary land agreements. The Applicant's land agents (Fisher German) met with the AP on 21 January 2025 to discuss accommodation works and ongoing concerns regarding the Project, which were relayed back to National Grid. Following this, a further meeting was held with the AP's agent on 26 May 2025 to discuss reducing the grantor's land shown on the HoTs plans and to confirm the severed areas. Version 2 HoTs were issued on 9 April 2026

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and the Applicant's agents also attended the AP's agents' group meeting on 4 June 2026, where the wider terms of the HoTs were discussed. Discussions are ongoing with the AP and their agent and the Applicant remains committed to reaching a voluntary agreement.

In relation to the AP's concerns about the Limits of Deviation ("LoD") and alternative routeing, the Applicant has applied LoD and the Rochdale Envelope in line with industry best practice. This is described in paragraphs 4.6.1 to 4.6.5 of 6.4 Environmental Statement Chapter 4 – Project Description **[APP-130]**, which details how the Rochdale Envelope and LoD have been assessed within the Environmental Statement (ES). Table 4.3 outlines the details of the LoD sought for the Project infrastructure types. LoD are a normal feature of Nationally Significant Infrastructure Project (NSIP) developments and represent the allowed maximum deviation for permanent features such as the overhead line, pylons, cable sealing end compounds, underground cables and new substations. This allows for the adjustment to final positioning and height of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise. The LoD sought across this AP's land is consistent with the wider Project. In terms of routeing and siting to avoid the AP's land, alternatives both east and west were considered in paragraphs 5.5.18 to 5.5.22 and Figure 5.5 of **7.20 2023 – Design Development Report for the Project [APP-358]**. Both options were longer, less direct (less compliant with the Holford Rules) and transferred effects to similar types and an increased number of receptors due to additional route length. The eastern alternative would also increase effects on the Grade I listed Church of St Michael on Church Road. The potential western option would not provide any benefit in respect of perceived impacts on Tibenham and Priory airfields. Less extreme alternatives were also considered as per paragraphs 5.4.24 to 5.4.28 and Figure 5.4 of **7.21 2024 – Design Development Report for the Project [APP-359]**; alternatives to the south and west would need to pass close to multiple residential properties and Grade II listed buildings near to Cargate Common and would increase the perceived risk on Tibenham airfield.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at

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Applicant's Response

Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

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Applicant's Response

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

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Applicant's Response

Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision

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Applicant's Response

authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

126. AP 126 - David and Heather Pearce

126.1 Person with Interest in Land (PIL) Reference ID: 7809

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my property.	Summary of Objection The AP objects on a number of grounds. In summary: (1) the AP asserts that National Grid has failed to demonstrate that the full extent of the rights sought over their property is genuinely necessary for the purposes of Section 122(2) of the Planning Act 2008, contending that the powers appear wider than reasonably required and have not been sufficiently justified; (2) the AP raises similar concerns in relation to the Section 122(3) test; (3) the AP contends that the Section 123 procedural test has not been met; and (4) the AP asserts non-compliance with the MHCLG 2013 Guidance on compulsory acquisition. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. Heads of Terms were first issued in October 2025 and Version 2 was issued in April 2026. No meeting has been held to date with the AP. The Applicant notes that there is minimal impact from the encroachment of the easement boundary of the overhead line on the AP's land. The Applicant remains committed to progressing discussions with the AP with a view to reaching a voluntary agreement and is open to meeting with the AP to discuss the HoTs and any concerns they may have.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do	A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a

Please summarise (in no more than 1500 words) the reason(s) for your objection

not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required.

5. Insufficient Attempts to Reach Agreement

The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely.

6. Human Rights Considerations

The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions.

The proposals also engage Article 8 rights relating to respect for private and family life and the home. A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my property rights and the lack of evidence that less intrusive

Applicant's Response

strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

alternatives have been fully explored, I do not consider that the necessary balance has been achieved.

Applicant's Response

strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant acknowledges that the compulsory acquisition of rights over the Affected Party's land engages Article 1 of the First Protocol (A1P1) and Article 8 to the European Convention on Human Rights, and the Examining Authority will recall that this was confirmed in the Applicant's responses to the Examining Authorities during ISH1, and in written submissions following that hearing. Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

The Applicant has established the need for the project in accordance with the requirements of section 3.3 of the National Policy Statement (NPS) EN-1 (November 2023), and Section 2.6 of National Policy Statement (NPS) EN-5, which addresses specifically the matters to be considered in respect of Land Rights and Land Interests in the delivery of Nationally Significant Infrastructure Projects.

With respect to demonstrating the compelling case in the public interest, as it is relevant under the requirements of A1P1, the Applicant's position is that has discharged obligations and the way this has been achieved is set out in the preceding paragraphs with respect to:

- The minimum rights necessary being sought;
- The consideration of alternatives;
- Minimisation of impact(s) on the AP's interest;
- Attempts to reach agreement, and
- The provision of compensation.

With regard to Article 8, The Applicant acknowledges that, where the exercise of powers sought can affect the Affected Party's home or private and family life - for example through proximity of construction activity, changes to residential amenity, or restriction of access to a dwelling - Article 8 of the European Convention on Human Rights is engaged. Like A1P1, Article 8 is a qualified right: any interference must be (i) in accordance with the law, (ii) in pursuit of a legitimate aim, and (iii) necessary in a democratic society. This requires the interference to correspond to a pressing social need and be proportionate to that overall aim. Addressing each of these three points in turn:

In accordance with the law: The powers are sought under the Planning Act 2008 regime, a lawful and Convention-compliant statutory process.

Legitimate aim: The Project pursues a legitimate aim recognised in National Policy Statements (NPS) EN-1 and EN-5 which are the reinforcement of the electricity transmission network in the public interest, including energy security and decarbonisation objectives to provide resilience in supply and meet future forecast demands.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Necessary in a democratic society / proportionality: The Applicant suggests that the following points are relevant:

- **Nature and degree of interference with the home:** The Applicant has undertaken significant optioneering exercises to arrive at a route which, on balance of all the issues considered, minimises the impacts on both the receiving environment and those who live and work within it, and this is demonstrated through the assessments provided in the Environmental Statement – in particular those relating to noise, construction impacts and traffic assessments, ecological assessments and health and wellbeing.
- **Mitigation specific to residential amenity:** the Code of Construction Practice (the current version of which will establish, working hours restrictions, noise mitigation, screening/landscaping, or micro-siting commitments applicable to this property, and any specific measures will be developed through ongoing engagement with the AP.
- **Alternatives considered:** Details of all the alternatives that have been considered, both in relation to the overall route, technologies and specifics around more specific constraints at a local level are described in the Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]
- **Procedural safeguards:** The Affected Party has had, and continues to have, the opportunity to participate in the Examination, make representations, and be heard - satisfying the procedural dimension of Article 8 that is part of the necessity assessment.
- **Compensation:** Where impacts on residential amenity are unavoidable, the statutory compensation regime is available.

On this basis, the Applicant is of the position that any interference with the Affected Party's rights under Article 8 is lawful, in pursuit of a legitimate aim, and necessary and proportionate, going no further than required to deliver the Project.

127. AP 127 - Francis Wolton

127.1 Person with Interest in Land (PIL) Reference ID: 13769

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my property.	Summary of Objection The AP objects on a number of grounds. In summary: (1) the AP asserts that National Grid has failed to demonstrate that the full extent of the rights sought over their property is genuinely necessary for the purposes of Section 122(2) of the Planning Act 2008, contending that the powers appear wider than reasonably required and have not been sufficiently justified; (2) the AP raises similar concerns in relation to the Section 122(3) test; (3) the AP contends that the Section 123 procedural test has not been met; (4) the AP asserts non-compliance with the MHCLG 2013 Guidance; (5) insufficient attempts to seek to acquire by agreement, and (6) the AP raises human rights concerns. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. A meeting took place on 20 April 2026 between the Applicant's land agents (Fisher German) and the AP's agents to negotiate Version 2 Heads of Terms,

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of	with National Grid also in attendance. The Applicant remains committed to reaching a voluntary agreement with the AP and continues to engage on both generic and site-specific matters. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the

Please summarise (in no more than 1500 words) the reason(s) for your objection

compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required.

5. Insufficient Attempts to Reach Agreement

The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely.

6. Human Rights Considerations

The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. The proposals also engage Article 8 rights relating to respect for private and family life and the home.

A fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the

Applicant's Response

Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

interference with my property rights and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.

Applicant's Response

Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant

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Applicant's Response

has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

In relation to the AP's human rights concerns, the Applicant refers to Section 8.1 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, which addresses the protected rights engaged by the Project and the Applicant's assessment of the proportionality of the interference with those rights.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report – Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be

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communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the Project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the Project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not

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Applicant's Response

providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[APP-303]**. This is based on published good practice and is designed to enable soils which have been handled and

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Applicant's Response

stockpiled to be reinstated to return land to its pre-construction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

The Applicant acknowledges that the compulsory acquisition of rights over the Affected Party's land engages Article 1 of the First Protocol (A1P1) and Article 8 to the European Convention on Human Rights, and the Examining Authority will recall that this was confirmed in the Applicant's responses to the Examining Authorities during ISH1, and in written submissions following that hearing. Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

The Applicant has established the need for the project in accordance with the requirements of section 3.3 of the National Policy Statement (NPS) EN-1 (November 2023), and Section 2.6 of National Policy Statement (NPS) EN-5, which addresses specifically the matters to be considered in respect of Land Rights and Land Interests in the delivery of Nationally Significant Infrastructure Projects.

With respect to demonstrating the compelling case in the public interest, as it is relevant under the requirements of A1P1, the Applicant's position is that has discharged obligations and the way this has been achieved is set out in the preceding paragraphs with respect to:

- The minimum rights necessary being sought;
- The consideration of alternatives;
- Minimisation of impact(s) on the AP's interest;
- Attempts to reach agreement, and
- The provision of compensation.

With regard to Article 8, The Applicant acknowledges that, where the exercise of powers sought can affect the Affected Party's home or private and family life - for example through

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Applicant's Response

proximity of construction activity, changes to residential amenity, or restriction of access to a dwelling - Article 8 of the European Convention on Human Rights is engaged. Like A1P1, Article 8 is a qualified right: any interference must be (i) in accordance with the law, (ii) in pursuit of a legitimate aim, and (iii) necessary in a democratic society. This requires the interference to correspond to a pressing social need and be proportionate to that overall aim. Addressing each of these three points in turn:

In accordance with the law: The powers are sought under the Planning Act 2008 regime, a lawful and Convention-compliant statutory process.

Legitimate aim: The Project pursues a legitimate aim recognised in National Policy Statements (NPS) EN-1 and EN-5 which are the reinforcement of the electricity transmission network in the public interest, including energy security and decarbonisation objectives to provide resilience in supply and meet future forecast demands.

Necessary in a democratic society / proportionality: The Applicant suggests that the following points are relevant:

- **Nature and degree of interference with the home:** The Applicant has undertaken significant optioneering exercises to arrive at a route which, on balance of all the issues considered, minimises the impacts on both the receiving environment and those who live and work within it, and this is demonstrated through the assessments provided in the Environmental Statement – in particular those relating to noise, construction impacts and traffic assessments, ecological assessments and health and wellbeing.
- **Mitigation specific to residential amenity:** the Code of Construction Practice (the current version of which is will establish, working hours restrictions, noise mitigation, screening/landscaping, or micro-siting commitments applicable to this property, and any specific measures will be developed through ongoing engagement with the AP.
- **Alternatives considered:** Details of all the alternatives that have been considered, both in relation to the overall route, technologies and specifics around more specific constraints at a local level are described in the Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]
- **Procedural safeguards:** The Affected Party has had, and continues to have, the opportunity to participate in the Examination, make representations, and be heard - satisfying the procedural dimension of Article 8 that is part of the necessity assessment.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- **Compensation:** Where impacts on residential amenity are unavoidable, the statutory compensation regime is available.

On this basis, the Applicant is of the position that any interference with the Affected Party's rights under Article 8 is lawful, in pursuit of a legitimate aim, and necessary and proportionate, going no further than required to deliver the Project.

128. AP 128 - Christian Croll and Karl Croll (including representatives to the Estate of Derek Charles Croll)

128.1 Person with Interest in Land (PIL) Reference ID: 5249

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my property is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this	Summary of Objection The AP objects on a number of grounds. In summary: (1) the AP asserts that National Grid has failed to demonstrate that the full extent of the rights sought over their property is genuinely necessary for the purposes of Section 122(2) of the Planning Act 2008, contending that the powers appear wider than reasonably required and have not been sufficiently justified; (2) the AP raises similar concerns in relation to the Section 122(3) test; (3) the AP contends that the Section 123 procedural test has not been met; (4) the AP asserts non-compliance with the MHCLG 2013 Guidance; (5) the AP asserts there have been insufficient attempts to secure the rights required by agreement, and (6) the AP raises human rights concerns. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. Heads of Terms documents were sent to the AP's agent on 7

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
requirement has been satisfied in relation to my property. 2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3) Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected owners and occupiers. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my property rights is justified or proportionate. 3. Disproportionate Impact on My Property Rights The proposed rights and associated powers would adversely affect my use and enjoyment of my home and property. As the owner and occupier, I would be subject to ongoing restrictions and uncertainty arising from the exercise of these rights. I do not consider that National Grid has adequately demonstrated that the impact on my property has been minimised or that the least intrusive solution has been adopted. The extent of the rights sought appears disproportionate to the purpose for which they are required. 4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered	May 2026, accompanied by an offer of a meeting. A meeting was subsequently held with the AP's agent on 22 May 2026 to discuss the HoTs and the impact of the Project on the AP's landholding. The Applicant remains committed to reaching a voluntary agreement with the AP and will continue to engage with the AP and their agent with a view to progressing towards agreed terms. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my property. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my property. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. The proposals also engage Article 8 rights relating to respect for private and family life and the home. A fair balance must be struck between the interests of the public and those whose rights	Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138], the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the

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are affected. Given the extent of the interference with my property rights and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through

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voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

In relation to the AP's human rights concerns, the Applicant refers to Section 8.1 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, which addresses the protected rights engaged by the Project and the Applicant's assessment of the proportionality of the interference with those rights.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the

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Applicant's Response

context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

The Applicant notes concerns raised by certain APs regarding the nature of permanent access rights sought by the Applicant. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project. The Applicant acknowledges that the compulsory acquisition of rights over the Affected Party's land engages Article 1 of the First Protocol (A1P1) and Article 8 to the European Convention on Human Rights, and the Examining Authority will recall that this was confirmed in the Applicant's responses to the Examining Authorities during ISH1, and in written submissions following that hearing. Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

The Applicant has established the need for the project in accordance with the requirements of section 3.3 of the National Policy Statement (NPS) EN-1 (November 2023), and Section 2.6 of National Policy Statement (NPS) EN-5, which addresses specifically the matters to be considered in respect of Land Rights and Land Interests in the delivery of Nationally Significant Infrastructure Projects.

With respect to demonstrating the compelling case in the public interest, as it is relevant under the requirements of A1P1, the Applicant's position is that has discharged obligations and the way this has been achieved is set out in the preceding paragraphs with respect to:

- The minimum rights necessary being sought;
- The consideration of alternatives;
- Minimisation of impact(s) on the AP's interest;
- Attempts to reach agreement, and
- The provision of compensation.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

With regard to Article 8, The Applicant acknowledges that, where the exercise of powers sought can affect the Affected Party's home or private and family life - for example through proximity of construction activity, changes to residential amenity, or restriction of access to a dwelling - Article 8 of the European Convention on Human Rights is engaged. Like A1P1, Article 8 is a qualified right: any interference must be (i) in accordance with the law, (ii) in pursuit of a legitimate aim, and (iii) necessary in a democratic society. This requires the interference to correspond to a pressing social need and be proportionate to that overall aim. Addressing each of these three points in turn:

In accordance with the law: The powers are sought under the Planning Act 2008 regime, a lawful and Convention-compliant statutory process.

Legitimate aim: The Project pursues a legitimate aim recognised in National Policy Statements (NPS) EN-1 and EN-5 which are the reinforcement of the electricity transmission network in the public interest, including energy security and decarbonisation objectives to provide resilience in supply and meet future forecast demands.

Necessary in a democratic society / proportionality: The Applicant suggests that the following points are relevant:

- **Nature and degree of interference with the home:** The Applicant has undertaken significant optioneering exercises to arrive at a route which, on balance of all the issues considered, minimises the impacts on both the receiving environment and those who live and work within it, and this is demonstrated through the assessments provided in the Environmental Statement – in particular those relating to noise, construction impacts and traffic assessments, ecological assessments and health and wellbeing.
- **Mitigation specific to residential amenity:** the Code of Construction Practice (the current version of which is will establish, working hours restrictions, noise mitigation, screening/landscaping, or micro-siting commitments applicable to this property, and any specific measures will be developed through ongoing engagement with the AP.
- **Alternatives considered:** Details of all the alternatives that have been considered, both in relation to the overall route, technologies and specifics around more specific constraints at a local level are described in the Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- **Procedural safeguards:** The Affected Party has had, and continues to have, the opportunity to participate in the Examination, make representations, and be heard - satisfying the procedural dimension of Article 8 that is part of the necessity assessment.
- **Compensation:** Where impacts on residential amenity are unavoidable, the statutory compensation regime is available.

On this basis, the Applicant is of the position that any interference with the Affected Party's rights under Article 8 is lawful, in pursuit of a legitimate aim, and necessary and proportionate, going no further than required to deliver the Project.

129. AP 129 - Dick Lanham

129.1 Person with Interest in Land (PIL) Reference ID: 2823

Please summarise (in no more than 1500 words) the reason(s) for your objection

I object to the proposed interference with my land rights at Sheddings Farm, Church Road, Dunton, Brentwood. The proposed access arrangements would result in a severe and disproportionate interference with my property rights, farming operations, business activities, privacy, security and enjoyment of my home.

My objection is not limited to construction access. I object to any proposed access through Sheddings Farm associated with the project, whether temporary, permanent, occasional, maintenance-related or otherwise. Any access through the property interferes with my land rights and has a direct impact on my home, family and farming business.

The proposed access route passes immediately adjacent to my family home and would introduce third-party access within close proximity of the dwelling. This creates significant safeguarding, privacy and security concerns. The presence of project personnel, contractors, vehicles or other authorised users accessing the land through this route

Applicant's Response

Summary of Objection

The AP objects to the proposed access arrangements at Sheddings Farm, Church Road, Dunton, Brentwood for the following reasons: (1) The proposed access will create severe and disproportionate impacts on both the AP's home and business, (2) The proposed access route passes adjacent to the AP's family home. There are safeguarding, privacy, and security concerns because of third party access within close proximity of the dwelling. This would change the character and security of his home environment, (3) Any other access linked to the project will interfere will have a similar direct impact on both the AP's home, family, and business, (4) The land affected is part of an active farm. Access has the potential to disrupt farming, interfere with grazing, and create biosecurity risks. (5) National Grid has not shown that the proposed interference is necessary or proportionate as required by s122 and s123, and (6) An alternative access via the public highway and neighbouring land avoids the impacts on my home and farming business. National Grid has considered alternative routes so they are available. The alternative access should be considered by the Examining Authority.

Land Rights Sought

The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 5 (access). Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest.

Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
would fundamentally alter the character and security of our home environment. The land affected forms part of an actively farmed agricultural holding. Any access through the property has the potential to disrupt farming operations, interfere with the use of grazing land and create ongoing biosecurity risks associated with the movement of people, vehicles and equipment through agricultural land. I do not consider that National Grid has demonstrated that the proposed interference with my land rights is necessary or proportionate as required by Sections 122 and 123 of the Planning Act 2008. An alternative access route exists via the public highway and neighbouring land which avoids the significant impacts on my home and farming business. This alternative route has been proposed to National Grid and Fisher German for a considerable period and would substantially reduce the interference with my rights whilst still enabling access to the relevant land. In addition, documents produced by National Grid appear to identify access to the same area of land from the direction of the alternative route, demonstrating that alternative means of access have been considered and are available.	The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 14 July 2026. In relation to the AP's concerns about agricultural impacts during the construction phase, the Applicant notes that during the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 – Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. A range of good practice mitigation measures relevant to the construction phase are set out in 7.2 Outline Code of Construction Practice [Revision G] and in 7.3 Outline Construction Traffic Management Plan [Revision F]. These include measures relevant to community liaison and also worker behaviour (for example, commitment GG05 states that construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the Project). Access The Applicant acknowledges the Affected Person's concerns regarding the potential effects of the proposed access arrangements on the privacy, security and enjoyment of their home. The Applicant has sought to minimise impacts on residential amenity through the design and refinement of access arrangements and by limiting the rights sought to those that are reasonably required for the construction, operation and maintenance of the Proposed Development. For the avoidance of doubt, and as explained by the Applicant during CAH3, there is an important distinction between construction access and the permanent access rights sought. The permanent Class 5 access rights sought over the AP's land would not be used for construction activities but would instead be exercised infrequently, where required,

Please summarise (in no more than 1500 words) the reason(s) for your objection

In these circumstances, I do not believe that National Grid has demonstrated a compelling case in the public interest for the interference proposed at Sheddings Farm. The availability of a less harmful alternative route means the proposed interference with my land rights is unnecessary and disproportionate.

For these reasons, I object to the compulsory acquisition and/or temporary possession of rights affecting Sheddings Farm and request that the Examining Authority gives full consideration to the alternative access arrangements which would significantly reduce the impact on my property, family and business.

Applicant's Response

for inspection, maintenance and operational purposes following completion of the Proposed Development. Construction access requirements are addressed separately through temporary powers sought for the delivery of the Project. This distinction significantly limits the frequency and nature of any future use of the permanent access rights.

Any access rights sought would be exercised only when required and would not result in unrestricted public access over the property. Access would be limited to authorised personnel undertaking activities associated with the Proposed Development. The Applicant notes the concerns regarding proximity to the dwelling and remains willing to engage with the Affected Person regarding the detailed routing and management of access arrangements to seek to reduce impacts where reasonably practicable.

The Applicant considers that the temporary and occasional use of access rights for, maintenance and operational purposes would not give rise to unacceptable effects on residential amenity and that the rights sought are proportionate to the requirements of the Proposed Development. The Applicant remains committed to ongoing engagement regarding alternative access arrangements and mitigation measures where these are practicable and consistent with the safe delivery and operation of the Project.

The Applicant has reviewed the alternative permanent access route proposed but this transfers the access route onto two other land ownerships. The Applicant continues to engage with the AP and the AP of the land affected by the proposed alternative. If voluntary agreements can be reached the Applicant will seek to use the alternative access route for future survey and maintenance requirements (See Additional Detailed Design Request reference ADDR-91 in Appendix F of **8.4.14 Applicant's Comments on any Further Information or Submissions Received [REP6-114]**). The Applicant has provided further detail ref 2.6 in 8.31 Response to Rule 17 letter Received 14th July 2026 in respect of the alternative permanent access.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

130. AP 130 - Paul Farrelly

130.1 Person with Interest in Land (PIL) Reference ID: 1289

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Serious ingress and egress issues to my property which is fairly isolated and only accessible by vehicle. Any road closure would completely cut off and isolate the property. Noise and light pollution / nuisance by the proposed works. Particularly relevant to myself with a [REDACTED]. Potential vibration structural / foundation damage to my home which is close to the roadside. Dust, dirt and visual blight. Danger posed by large machinery working in such close proximity to property housing family members. Loss of value of my property. Saleability and mortgageability issues.	Summary of Objection The AP objects on (1) a number of construction related grounds:- (a) - Concern that road closures would cut off and isolate a property which is fairly isolated and only accessible by vehicle; (b) - Impacts from noise and light pollution, and the nuisance caused by the proposed works; (c) - Potential structural and/or foundation damage, and problems linked to vibration, dust, dirt and visual blight as a result of the house being close to the roadside; (d) Dangers arising from large machinery working close to a family home, and (2) the AP is also concerned about a loss of property value, with concerns about mortgage ability and saleability. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, subsoil interest. Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. Land Rights Sought Consolidated Response In relation to the AP's concerns about noise and vibration, the Applicant confirms that noise and vibration is assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [Revision B]. Noise and vibration effects have been assessed at this location and significant adverse effects are not expected during either the construction or operational phases. In relation to the AP's concerns regarding access to their property during construction, the Applicant recognises the importance of maintaining appropriate access arrangements for residents, businesses and landowners affected by the Project. Detailed traffic management

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and access arrangements will be developed as part of the construction planning process and implemented in accordance with the approved construction controls secured through the Project. The Applicant will continue to engage with affected persons regarding site-specific access requirements and seek to minimise disruption so far as reasonably practicable.

Regarding matters of safety, the Applicant confirms in paragraph 4.2.1 of 7.2 Outline Code of Construction Practice [Version G] that the project will be carried out in accordance with the Construction (Design and Management) Regulations 2015 which are concerned with the management of health and safety risks arising from construction activities, including risks to persons who may be affected by the works, such as members of the public. Accordingly, construction-related public safety matters are already subject to a comprehensive statutory regulatory regime, supplemented by the controls secured through the OCoCP. The active works areas will be demarcated separating work sites from publicly accessible areas. The Applicant recognises that construction and/or visual impacts from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

131. AP 131 - Mr Philip Brown & Mrs G Brown

131.1 Person with Interest in Land (PIL) Reference ID: 17593

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We have major concerns regarding the impact heavy machinery would have on the integrity our listed dwelling, which is around 400 years old. We also have concerns about the effect the increased traffic would have on the footfall to our small butchery and farm shop and even more concerns about the noise and vibrations will have on our livestock. The B1113 is already of an insufficient width for the increased amount of heavy modern farm vehicles and lorries which regularly use it, you can already see where the bank at the front of our boundary has been eroded by large vehicles attempting to pass each other on the bend and there is nowhere that roadway widening or passing places could be introduced within the existing public highway.	Summary of Objection The AP objects on the basis of concerns regarding the impact of the construction phase on their property and business. Specifically, the AP raises concerns regarding: t(1) the impact of construction traffic on their home, a 400 year old listed building, and the erosion of the bank at the front of the property as a result of the B1113 being unable to accommodate HGV traffic safely, (2) the effect increased traffic will have on the footfall to the small butchery and farm shop, and (3) the impact of noise and vibrations on their livestock. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, subsoil interest. Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. In relation to the AP's specific concerns about construction traffic, the Applicant notes that the peak construction traffic generated on the B1113 Finningham Road (Primary Access Route 12) is a total of 372 vehicles per day (12 hours, 07:00–19:00), equating to 31 vehicles per hour, approximately 1 vehicle every 2 minutes. The duration of this peak construction traffic is expected to occur over 6 months (February to July 2028). Construction traffic will be less outside of this peak period. This information is set out in 6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects [Revision B]. In direct response to the AP's concern about the width of the B1113, the Applicant confirms that it proposes to widen the B1113 at this location to accommodate two-way HGV movements.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to noise and vibration, noise and vibration effects have been assessed in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [Revision B]** and significant adverse effects are not expected at this location during either the construction or operation and maintenance phases. Impacts on local businesses are presented in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision C]**; no significant residual effects are anticipated following the implementation of measures set out in **7.3 Outline Construction Traffic Management Plan (CTMP) [Revision F]** and **7.2 Outline Code of Construction Practice [Revision G]**. The CTMP sets out various good practice and other management measures associated with construction traffic. Mitigation measure GG35 in the **7.2 Outline Code of Construction Practice [Revision G]** states that members of the community and local businesses will be kept informed regularly of the works through active community liaison.

The Applicant acknowledges the comment provided. Although the listed dwelling referred to in the submission is not specifically identified, based on the land parcel referenced the Applicant understands the comments to relate to Otters Brook Cottage (1387251), a Grade II listed building.

Otters Brook Cottage (1387251) has been assessed in **6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [Revision C]**. The assessment was informed by site visits, aerial imagery and street-view imagery. The closest pylon would be located approximately 550 m to the north of the asset. The Applicant concluded that, due to intervening mature tree growth providing screening, the setting of the asset does not extend to the Order Limits.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

132. AP 132 - Christopher Padfield

132.1 Person with Interest in Land (PIL) Reference ID: 14511

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Failure to Demonstrate Necessity – Section 122(2) Section 122(2) of the Planning Act 2008 requires the Secretary of State to be satisfied that the rights sought are required for the development, are required to facilitate the development, or are incidental to it. I do not consider that National Grid has demonstrated that the full extent of the rights sought over my land is genuinely necessary. The powers sought appear wider than reasonably required and have not been sufficiently justified. In particular, it has not been demonstrated why more limited rights, reduced land take or temporary arrangements would be insufficient. The Department for Communities and Local Government Guidance Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) states that applicants should seek no more land or rights than are reasonably required for the proposed development. I do not believe this requirement has been satisfied in relation to my land.	Summary of Objection The AP objects on a number of grounds. In summary: (1) the AP asserts that National Grid has failed to demonstrate that the full extent of the rights sought over their property is genuinely necessary for the purposes of Section 122(2) of the Planning Act 2008, contending that the powers appear wider than reasonably required and have not been sufficiently justified; (2) the AP raises similar concerns in relation to the Section 122(3) test; (3) the AP contends that the Section 123 procedural test has not been met; (4) the AP asserts non-compliance with the MHCLG 2013 Guidance; (5) that insufficient attempts have been made to secure the rights required by agreement, and (6) the AP challenges the adequacy of the consideration given to alternative routes or solutions. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Leasehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 3 (underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Please summarise (in no more than 1500 words) the reason(s) for your objection

2. Failure to Establish a Compelling Case in the Public Interest – Section 122(3)

Section 122(3) requires there to be a compelling case in the public interest before compulsory acquisition powers can be granted. The Guidance makes clear that a fair balance must be struck between the public interest and the private loss suffered by affected landowners. In my case, I do not consider that National Grid has demonstrated why the extent of the interference with my land rights is justified or proportionate.

3. Disproportionate Impact on My Agricultural Holding

The proposed rights and associated powers would adversely affect the efficient operation of my agricultural holding. Their exercise has the potential to disrupt farming activities, restrict access for agricultural machinery, interfere with field operations and reduce the flexibility with which the land can be managed. As an agricultural business, the cumulative effect of these restrictions extends beyond the area directly affected and has implications for the efficient and economic operation of the holding as a whole. I do not consider that National Grid has adequately demonstrated that these impacts have been minimised or that the least intrusive solution has been adopted.

Applicant's Response

Populated Heads of Terms are not ordinarily issued to Occupiers or Leaseholder interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest freeholder, or through the exercise of the powers sought in the Order. Whilst Heads of Terms are not generally required, persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

In relation to the AP's concerns about the impact on agricultural land, during the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 – Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
4. Failure to Minimise Interference and Consider Alternatives The 2013 Guidance expects applicants to demonstrate that they have considered alternatives and have minimised the extent of compulsory powers wherever possible. I do not believe sufficient consideration has been given to alternative arrangements, revised working methods or narrower rights that could reduce the impact on my land and agricultural operations. The extent of the rights sought appears to provide operational flexibility to the Applicant rather than reflecting the minimum rights reasonably required. 5. Insufficient Attempts to Reach Agreement The Guidance states that compulsory acquisition powers should be used only as a last resort and that applicants should make reasonable efforts to acquire land and rights by agreement. I do not consider that sufficient progress has been made through negotiation or that all reasonable steps have been exhausted before seeking compulsory powers over my land. In my view, the use of compulsory powers is being pursued prematurely. 6. Human Rights Considerations The proposed acquisition of rights engages Article 1 of the First Protocol to the European Convention on Human Rights, which protects the peaceful enjoyment of possessions. A	alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
fair balance must be struck between the interests of the public and those whose rights are affected. Given the extent of the interference with my agricultural land and the lack of evidence that less intrusive alternatives have been fully explored, I do not consider that the necessary balance has been achieved.	financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 – Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant acknowledges that the compulsory acquisition of rights over the Affected Party's land engages Article 1 of the First Protocol (A1P1) and Article 8 to the European Convention on Human Rights, and the Examining Authority will recall that this was confirmed in the Applicant's responses to the Examining Authorities during ISH1, and in written submissions following that hearing. Under A1P1 interference with peaceful enjoyment of possessions is permissible where it is (i) lawful, (ii) in pursuit of a legitimate aim in the public interest, and (iii) proportionate, which means a fair balance between the general interest of the wider community (in this case users of the UK's electricity transmission network) and the protection of the individual's rights.

The Applicant has established the need for the project in accordance with the requirements of section 3.3 of the National Policy Statement (NPS) EN-1 (November 2023), and Section 2.6 of National Policy Statement (NPS) EN-5, which addresses specifically the matters to be considered in respect of Land Rights and Land Interests in the delivery of Nationally Significant Infrastructure Projects.

With respect to demonstrating the compelling case in the public interest, as it is relevant under the requirements of A1P1, the Applicant's position is that has discharged obligations and the way this has been achieved is set out in the preceding paragraphs with respect to:

- The minimum rights necessary being sought;
- The consideration of alternatives;
- Minimisation of impact(s) on the AP's interest;
- Attempts to reach agreement, and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- The provision of compensation.

With regard to Article 8, The Applicant acknowledges that, where the exercise of powers sought can affect the Affected Party's home or private and family life - for example through proximity of construction activity, changes to residential amenity, or restriction of access to a dwelling - Article 8 of the European Convention on Human Rights is engaged. Like A1P1, Article 8 is a qualified right: any interference must be (i) in accordance with the law, (ii) in pursuit of a legitimate aim, and (iii) necessary in a democratic society. This requires the interference to correspond to a pressing social need and be proportionate to that overall aim. Addressing each of these three points in turn:

In accordance with the law: The powers are sought under the Planning Act 2008 regime, a lawful and Convention-compliant statutory process.

Legitimate aim: The Project pursues a legitimate aim recognised in National Policy Statements (NPS) EN-1 and EN-5 which are the reinforcement of the electricity transmission network in the public interest, including energy security and decarbonisation objectives to provide resilience in supply and meet future forecast demands.

Necessary in a democratic society / proportionality: The Applicant suggests that the following points are relevant:

- **Nature and degree of interference with the home:** The Applicant has undertaken significant optioneering exercises to arrive at a route which, on balance of all the issues considered, minimises the impacts on both the receiving environment and those who live and work within it, and this is demonstrated through the assessments provided in the Environmental Statement – in particular those relating to noise, construction impacts and traffic assessments, ecological assessments and health and wellbeing.
- **Mitigation specific to residential amenity:** the Code of Construction Practice (the current version of which is will establish, working hours restrictions, noise mitigation, screening/landscaping, or micro-siting commitments applicable to this property, and any specific measures will be developed through ongoing engagement with the AP.
- **Alternatives considered:** Details of all the alternatives that have been considered, both in relation to the overall route, technologies and specifics around more specific constraints at a local level are described in the Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- **Procedural safeguards:** The Affected Party has had, and continues to have, the opportunity to participate in the Examination, make representations, and be heard - satisfying the procedural dimension of Article 8 that is part of the necessity assessment.
- **Compensation:** Where impacts on residential amenity are unavoidable, the statutory compensation regime is available.

On this basis, the Applicant is of the position that any interference with the Affected Party's rights under Article 8 is lawful, in pursuit of a legitimate aim, and necessary and proportionate, going no further than required to deliver the Project.

133. AP 133 - MARGARET STANCOMBE

133.1 Person with Interest in Land (PIL) Reference ID: 24824

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
There are still important points outstanding and the Heads of Terms have not yet been sufficiently progressed.	Summary of Objection The AP objects on the basis that (1) there are important outstanding points that have not yet been resolved in negotiations and (2) that the Heads of Terms offered by the Applicant are not yet sufficiently progressed to enable the AP to reach agreement with the Applicant and withdraw their objection. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response It is accepted that agreement has not been reached yet so that the objection can be withdrawn. However, the Applicant has been engaging with the APs representative, with the latest correspondence sent on 30th June 2026 with a view to reaching an agreement. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added):

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

"Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

134. AP 134 - Jeremy Robin Sibson-Barnes

134.1 Person with Interest in Land (PIL) Reference ID: 1661

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I believe in the tenants of Common Law that a Freeholder should be the only entity that holds the various rights over their land	Summary of Objection The AP objects on the basis of a principled belief in common law property rights, specifically that a freeholder should be the only entity holding rights over their land. As a result, it is assumed that the AP objects to the compulsory acquisition of lesser rights or powers over their land by the Applicant. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure) and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid and for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant can confirm that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. A meeting was held on 3 February 2026, at which accommodation works were discussed, including crossing points and permanent access routes. The AP has a number of towers located on their land. Discussions have been constructive and the Applicant remains committed to progressing negotiations towards a voluntary agreement, with further engagement anticipated as the HoTs process continues.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant can confirm that it does not believe powers of compulsory acquisition are limited to acquisition of the freehold only, as the AP suggests.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

135. AP 135 - Kay Norman

135.1 Person with Interest in Land (PIL) Reference ID: 1755

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
there has been a complete lack of engagement from National Grid and Fisher German with no consideration given to the affect on the life of people this affects	Summary of Objection The AP objects on the basis that (1) the Appicant has made insufficient attempts to seek to acquire the required rights by negotiation, and (2) no consideration has been given to the effect of the Project on people affected by it. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, subsoil interest. Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. Consolidated Response The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, subsoil interest. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. The Applicant takes seriously any concern raised regarding the adequacy of engagement with affected persons and notes the AP's comments. The Applicant has undertaken an extensive engagement programme throughout the development of the Project. The Applicant remains committed to engaging with this AP to discuss their concerns and to progress towards a voluntary land agreement, and invites the AP to make contact with the Applicant's land agents (Fisher German) to arrange a meeting to discuss any outstanding matters. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory

Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report – Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

136. AP 136 - Andrew Harry Harbott Stevens

136.1 Person with Interest in Land (PIL) Reference ID: 9034

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Consultations have been defective - see Legal opinion of Lord Charles Banner QC submitted by Essex Suffolk Norfolk campaign group who found numerous legal deficiencies in National Grid's approach to the consultations arguing it falls well short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination	Summary of Objection The AP objects on the basis that the pre-application consultation was defective, and so was insufficient to enable the Application to proceed to Examination. The AP makes particular reference to the legal opinion of Lord Charles Banner KC submitted by the Essex Suffolk Norfolk campaign group. The AP contends that the consultation process did not comply with the relevant statutory requirements and applicable guidance, and common law principles as cited by Lord Banner, KC. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold, Occupation and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. Version 2 Heads of Terms were issued on 26 March 2026 and the Applicant has continued to engage on HoTs with the AP's agent, most recently on 4 June 2026 to negotiate the HoTs. The Applicant remains committed to reaching a voluntary agreement with this AP. No site-specific requests have been made to the Applicant by the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

AP or their agent following the issue of HoTs and the Applicant would welcome any such engagement in order to address any specific concerns the AP may have regarding the impact of the Project on their landholding.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, the AP has asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the adequacy of consultation can be found in 5.1 Consultation Report – Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

137. AP 137 - Alcemi Storage Developments 1 Limited

137.1 Person with Interest in Land (PIL) Reference ID: 28327

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We have submitted the requested online form for the interests shown in the Land Rights Tracker, with the Interest in Land (PIL) Reference ID 28327, confirming no objection in relation to these plots. This relates to land held under an Option with R Jackson (East Anglia) Limited dated 28 March 2024. However, Alcemi hold another Option, dated 18 March 2025 with Thornbush Energy Limited. This has been flagged in representations to date as not appearing in the Book of Reference and Alcemi's interest in these plots does not appear to be reflected in the Land Rights Tracker. We therefore cannot deal with these interests via the online form. I attach the previously submitted representations which set out these affected plots (all within Sheet 20). Discussions are continuing with the Promoter to resolve Alcemi's concerns around these plots, but until a suitable Framework Agreement is entered into, Alcemi must continue	Summary of Objection The AP's objection concerns the identification of some of the land interests in the Book of Reference. (1) The AP confirms that they submitted a prior interest in participation form (PIL Ref 28327) confirming no objection in respect of certain plots — namely land subject to an Option Agreement with R Jackson (East Anglia) Limited dated 28 March 2024. (2) However, the AP does object to the compulsory acquisition affecting plots within an Option Agreement dated 18 March 2025 with Thornbush Energy Limited over land affected by the Project. The AP asserts that this latter interest has not appeared in the Book of Reference and that their interest as optionholder under that agreement has not been captured in the Order documentation. The AP seeks confirmation that this interest will be properly recorded and that the AP will be treated as an affected person in relation to the relevant plots. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Easement Right or Privilege. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response In relation to the Option dated 18 March 2025 between Alcemi and Thornbush Energy Limited, the Applicant acknowledges Alcemi's concern that this interest is not currently reflected within the Book of Reference and Land Rights Tracker. The Applicant will review the information provided and continue engagement with Alcemi to ensure that any relevant land interests are appropriately considered and, where necessary, reflected in the Project documentation.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
their objection to the compulsory acquisition of these plots	The Applicant notes that discussions regarding a Framework Agreement remain ongoing. The Applicant remains committed to engaging constructively with Alcemi and its representatives to seek to resolve outstanding concerns and, where possible, secure an agreed position. Discussions have progressed positively and are continuing with a view to reaching an appropriate agreement that protects the interests of both parties whilst enabling delivery of the Proposed Development. Notwithstanding the ongoing discussions, the Applicant considers that the land and rights sought are required for the purposes of the Proposed Development and that there remains a compelling case in the public interest for their acquisition. The Applicant will continue to seek to secure the necessary rights by agreement wherever possible and remains committed to progressing negotiations with Alcemi in advance of the close of Examination. The Applicant acknowledges Alcemi's position regarding its Option Agreement with Thornbush Energy Limited dated 18 March 2025 and the concern that certain interests associated with that option have not been reflected in the Book of Reference or Land Rights Tracker. The Applicant notes that Alcemi has previously raised this matter through its Examination representations in relation to land on Sheet 20 associated with the proposed Brunfort BESS. The Applicant continues to engage with Alcemi regarding the interface between the Project and the Brunfort BESS proposals, including through discussions on a voluntary agreement intended to secure appropriate cooperation between the parties. The Applicant will continue to review land interest information as engagement progresses and, where necessary, ensure that the relevant project documents accurately reflect interests which are required to be identified for the purposes of the Application. Discussions remain ongoing with Alcemi with a view to resolving outstanding concerns. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

138. AP 138 - ANITA MARGARETA OCTAVIA MOORE

138.1 Person with Interest in Land (PIL) Reference ID: 858

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I have lived in Tibenham all my life and my family has farmed the land for generations. This will not only affect family farming land but will also alter the view of Tibenham and the countryside permanently. I believe it is not in the best interests for the countryside in anyway to be disrupted in such a manner.	Summary of Objection The AP objects on personal grounds. The AP has lived in Tibenham all of her life and her family has farmed the land in that area for generations. The AP states that the Project will (1) directly impact the family's farming land, and by implication the farming enterprise, and (2) and will permanently and irreversibly alter the view of Tibenham and the surrounding countryside, causing lasting harm to the landscape and to the AP's way of life. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is not seeking any rights in its own right from this AP directly for the National Grid element: the relevant rights are being acquired by UKPN, who are actively engaging with the AP. No version 2 Heads of Terms have been sent to the AP by National Grid in those circumstances. Consolidated Response The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors through the routeing and siting of infrastructure. The Applicant notes the concerns related to views to and from Tibenham. Effects on visual receptors within Tibenham are set out under Visual Receptor Area (VRA) A7 (paragraphs 13.4.72 to 13.4.82) and A8 (paragraphs 13.4.84 to 13.4.93) in Section 13.8 in 6.13.A3 Environmental

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]. Significant visual effects are identified within approximately 1.5 km of the Project. Views from the landscape surrounding Tibenham are represented by Viewpoint 1.09 in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]**, approximately 0.6 km from the nearest above ground structure of the Project. Views towards Tibenham from further afield are represented by Viewpoint 1.10 in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]**.

Effects on landscape receptors within Tibenham parish are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [Revision B]** under Landscape Character Area (LCA) B1 Tas Tributary Farmland in paragraphs 13.3.111 to 13.3.124 and LCA E2 Great Moulton Plateau Farmland in paragraphs 13.3.97 to 13.3.109. Significant effects are identified within approximately 1.5 km of the Project. Although significant landscape and visual effects have been identified, the rural farmland landscape will remain in place beneath and around the proposed overhead line.

In relation to the AP's concerns about the impact on agricultural land, during the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in **6.6 Environmental Statement Chapter 6 – Agriculture and Soils [Revision B]** for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

These measures, including the aftercare period, will ensure the soils have returned to their pre-construction condition.

Impacts of the Project relating to health and wellbeing are presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]**. This includes an assessment of impacts on mental wellbeing during both the construction and operation stages. The assessment highlights that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would bring, and that visual amenity is critical in shaping an individual's perceptions of their surroundings. The assessment concludes that whilst there is scientific evidence that identifies a link between visual change and health outcomes, there is also evidence that suggests habituation and adaptation with time. A minor adverse effect on health and wellbeing has been noted as a result, although this is not significant.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

In relation to this AP's concerns about the environmental impact of the Project more generally, the Applicant refers to 6.1 Environmental Statement – Non-Technical Summary **[APP-105]** and the Environmental Statement as a whole. The Environmental Statement and accompanying documents are extensive and address a comprehensive range of environmental topics including landscape and visual impact, agriculture and soils, health and wellbeing, noise and vibration, ecology and biodiversity, cultural heritage, and socio-economics and tourism. The Environmental Statement was assessed against all relevant national policy and guidance in NPS EN-1 and NPS EN-5, and the Applicant considers that the Project complies with the applicable policy tests, including those relevant to landscape and visual impacts.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and,

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

139. AP 139 - Gavin Peter Moore

139.1 Person with Interest in Land (PIL) Reference ID: 624

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
My family has farmed this land for generations. This will not only affect my family farming land and business but will also alter the view of the land and the countryside permanently. I believe it is not in the best interests for the countryside in anyway to be disrupted in such a manner.	Summary of Objection The AP objects on the basis that the Project will (1) directly affect their family's farming land, and by implication the farming enterprise, and will permanently and irreversibly alter the view of the surrounding countryside, causing lasting harm to the landscape and to the AP's farming operations and way of life. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure) and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant confirms that it has been actively engaged with this AP in seeking to reach a voluntary land agreement. A meeting was held with the AP and their agent on 23 January 2026 to discuss practical matters associated with the Project, including permanent access routes and UKPN mitigation works. Engagement with the AP's representatives has continued and the Applicant's agents have met with the AP's representatives on multiple occasions to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

negotiate and progress HoTs, with the most recent meeting being held on 26 May 2026. Version 2 HoTs were sent on 9 April 2026, accompanied by an offer of a meeting to discuss their content. The AP's representative also attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026. The Applicant remains committed to reaching a voluntary agreement with the AP and continues to engage on both generic and site-specific matters.

The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors through the routeing and siting of infrastructure. Effects on visual receptors within Tibenham are set out under Visual Receptor Area (VRA) A7 (paragraphs 13.4.72 to 13.4.82) and VRA A8 (paragraphs 13.4.84 to 13.4.93) in Section 13.8 in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]**. Significant visual effects are identified within approximately 1.5 km of the Project. Views from the landscape surrounding Tibenham are represented by Viewpoint 1.09 in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]**, approximately 0.6 km from the nearest above ground structure of the Project. Views towards Tibenham from further afield are represented by Viewpoint 1.10 in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [Revision B]**.

Effects on landscape receptors within Tibenham parish are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [Revision B]** under Landscape Character Area (LCA) B1 Tas Tributary Farmland in paragraphs 13.3.111 to 13.3.124 and LCA E2 Great Moulton Plateau Farmland in paragraphs 13.3.97 to 13.3.109. Significant effects are identified within approximately 1.5 km of the Project. Although significant effects on landscape and visual receptors have been identified, the rural farmland landscape will remain in place beneath and around the proposed overhead line.

In relation to the AP's concerns about the impact on agricultural land, during the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in **6.6 Environmental Statement Chapter 6 – Agriculture and Soils [Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their pre-construction condition.

Impacts of the Project relating to health and wellbeing are presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]**. This includes an assessment of impacts on mental wellbeing during both the construction and operation stages. The assessment highlights that community mental health and wellbeing can be impacted by changes to landscapes and the views that exist as a result of the permanent visual changes the Project would bring, and that visual amenity is critical in shaping an individual's perceptions of their surroundings. The assessment concludes that whilst there is scientific evidence that identifies a link between visual change and health outcomes, there is also evidence that suggests habituation and adaptation with time. A minor adverse effect on health and wellbeing has been noted as a result, although this is not significant.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

In relation to this AP's concerns about the environmental impact of the Project more generally, the Applicant refers to 6.1 Environmental Statement – Non-Technical Summary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

[APP-105] and the Environmental Statement as a whole. The Environmental Statement and accompanying documents address a comprehensive range of environmental topics including landscape and visual impact, agriculture and soils, health and wellbeing, noise and vibration, ecology and biodiversity, cultural heritage, and socio-economics and tourism. The Environmental Statement was assessed against all relevant national policy and guidance in NPS EN-1 and NPS EN-5, and the Applicant considers that the Project complies with the applicable policy tests, including those relevant to landscape and visual impacts.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

140. AP 140 - Sara Price

140.1 Person with Interest in Land (PIL) Reference ID: 2605

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I have tried to engage with this project through my representative but they have had little to no success obtaining answers/solutions and to make real progress, progress is painfully slow, they seem unwilling to fully engage to resolve our issues and concerns. They wish to use my property to access another party's land, I have made recommendations and suggestions which would mean my property would not need to be used, also saving them time and money, this suggestion has been ignored. This is not simply a field issue, my property is a private residents with no connection to the land they wish to use, compulsory acquisition of land or rights or even temporary possession is completely wrong given our attempts to engage with the project and would have a massive negative impact of the use and freedoms with my property. Most concerning is the fact that they wish to use my property for 7-10 years, that is a massive restriction on my home and life	Summary of Objection The AP objects on a number of grounds relating to the proposed access arrangements affecting their property. The AP beleives that (1) engagement is weak and provides little to no answers and solutions, (2) failed to consider/respond to suggeststons of an alternative access, and (3) the proposed rights will result in an impact lasting 7-10 years, so imposing restrictions on the AP's home and life. The AP also reports difficulty in obtaining answers and resolving issues throughout the process. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold and Occupation. Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026. In relation to the AP's specific concerns about the proposed access route, the Applicant confirms that the access in question relates to works in connection with the British Pipeline Agency (BPA) programme associated with the Project and is small in nature. The Applicant has been engaging with the APs representative, with the latest correspondence on 30th June 2026 regarding the APs concerns. The Applicant is confident that vehicles and plant for this portion of the works can be kept to a minimum such that the proposed access route will be suitable. The Applicant does not envisage any vehicles larger than typical farm plant will be

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
considering the pipeline and future equipment is on someone else's land with its own access I feel that the lack of engagement from them is stopping solutions from being found, there are very few land owners involved in the pipe line side of the project and with some simple face to face meetings this could of been resolved weeks ago. I feel that direct individual contact I.E meetings with pipeline affected residents and their representatives could resolve issues and have contracts in place in a matter of weeks.	required. In a worst case, if plant, e.g. a 6-tonne tracked digger, was to be delivered by HGV, then it could be unloaded at the mouth of the track and driven up the track under its own power. The Applicant will work with the landowner to meet their security requirements. Commitment reference AS03 set out in 7.2 Outline Code of Construction Practice covers how the Applicant will ensure access is maintained through the construction phase to all residential, commercial, community and agricultural land uses. It is for these reasons that the Applicant deems it suitable to utilise an existing access track as opposed to creating a new one, potentially creating a greater impact. Specific discussions with the landowner would be undertaken by the Applicant and the delivery contractor for the works prior to and during construction to manage access and minimise disruption during the mitigation works (this could include delivery of vehicles and equipment to the entrance and tracking along to the works if required), with a not significant effect anticipated. The Applicant and BPA will continue to engage with the affected party through detailed design and construction to minimise impacts accordingly. In relation to the AP's concerns about the adequacy of engagement, the Applicant takes seriously any concern raised regarding the level of engagement with affected persons. The Applicant has undertaken an extensive engagement programme throughout the development of the Project and remains committed to engaging with this AP to discuss their concerns, including the AP's suggested alternative access arrangement, and to explore whether this can be accommodated. The Applicant invites the AP to make contact with the Applicant's land agents (Fisher German) to arrange a meeting to discuss any outstanding matters in further detail. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report – Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

141. AP 141 - Alison Mary Hayward

141.1 Person with Interest in Land (PIL) Reference ID: 13768

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We have been successful in persuading National Grid to relocate one pylon, but only because with the assistance of a NG engineer we were able to demonstrate a benefit to NG of relocating the pylon. We have suggested both in writing and at face to face site meetings re routing a permanent access way to reduce the impact on the farm and to offer NG a more direct shorter route to the relevant pylon. In meeting Fisher German agree with us and say they will take it to NG, but nothing happens. The convoluted route remains the route being persued. We were asked at the initial consultations to put forward proposals to mitigate the loss of 30 acres of grass for 5 years which will severely affect our sheep numbers. We found our neighbouring farm is willing to put 30 acres of arable land into a 5 year ley and let this to us. We have written to Fisher German numerous times asking for accomodation works to achieve this i.e fencing and seeding of grass. Nothing has been heard in response. At our last meeting with FG in May we were told that nothing	Summary of Objection The Applicant understands that Alison Mary Hayward's objection relates to two principal concerns: (1) that the proposed permanent access route to the relevant pylon is unnecessarily convoluted and that, despite agreement at site meetings that a more direct and shorter route would benefit both parties, nothing has changed; and (2) , that requests for accommodation works to mitigate the loss of approximately 30 acres of grass for five years — which would severely affect sheep numbers — have gone unanswered, notwithstanding that a viable solution (a neighbouring farm prepared to put 30 acres of arable land into a five-year ley) has been proposed in writing and at face-to-face meetings. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UK Power Networks ("UKPN"), the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid. Certain parcels in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response The Applicant's land agent, Fisher German (Stefan Kohli), met with the AP's agent on 21 May 2026, at which meeting the Heads of Terms ("HoTs") document was reviewed and the agent provided feedback on the terms, which was fed back to National Grid as part of the updated HoT drafting. The Applicant acknowledges that the AP is working to mitigate losses

Please summarise (in no more than 1500 words) the reason(s) for your objection

could be done until the DCO was determined. But to have grass to graze in Spring 2026 we need to be sowing the grass this autumn and that means NG should be negotiating and drafting a Farm Business Tenancy now. It would be easy to agree a break clause in the event of the DCO being refused.

It is immensely frustrating to face the threat of serious damage to your farming business and be unable to have a dialogue with NG to address the issues and resolve them. NG doesn't seem to care about what damage it does so long as the line is built on time, it appears blind to everything else.

Applicant's Response

by exploring alternative grazing land and is open to entering into discussions to form a supplementary agreement to address the mitigation of losses. The Applicant is open to further engagement with the AP and their appointed agent to reach a satisfactory position as part of the ongoing negotiations on the Heads of Terms. It should be noted that any agreement will need to be based on reasonable justification and on a proven loss basis in line with the Compensation Code.

With regard to the permanent access route, the Applicant confirms that permanent rights of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO. The Applicant invites the AP to continue to engage with Fisher German on the proposed routing of the permanent access as part of the ongoing HoT discussions, so that an agreed and more direct route can be documented at the appropriate time.

UK Power Networks have received confirmation from the AP that they have an agent acting on their behalf. UK Power Networks offered a site meeting for multiple dates in May 2026, and await a response from the agent to get this meeting co-ordinated. UK Power Networks are keen to engage with the AP and discuss the UK Power Networks works, with the hope of reaching voluntary agreement for the rights required.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]** are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

The Applicant notes concerns raised by certain APs regarding the nature of permanent access rights sought by the Applicant. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

142. AP 142 - Jane Sarah Bird

142.1 Person with Interest in Land (PIL) Reference ID: 2820

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
There is a lack of necessity to acquire these rights when clearly short term rights would suffice. There are a number of locations where rights are looking to be acquired just for future convenience of the project. This disproportionately prevents efficient and profitable running of the farm in the future. There has been no consideration of any alternatives to minimize the effect on property rights. No consultation with landowners has been taken seriously and they cannot show where any discussions have been taken into account. Insufficient negotiations have been made to discuss the Heads of terms, they cannot show where any discussions have been taken into account when drawing up these very generic and wide spread heads of terms.	Summary of Objection The Applicant understands that Jane Sarah Bird's objection raises three principal concerns: (1) it is not necessary to acquire the rights sought from the AP, (2) there has been no consideration of alternatives, and no evidence that discussions have been taken into account, and (3) that insufficient negotiations have been made regarding the Heads of Terms, which are generic and wide-ranging. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, restrictive covenant, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project. Consolidated Response The Applicant has met with the AP's representative, Brooks Leney, on multiple occasions to negotiate and progress the HoTs, most recently at a meeting held on 15 June 2026. Revised Terms will be issued in due course and the Applicant continues to engage with the AP's agent. The AP's representatives also attended an Agent's Group meeting with Fisher German and National Grid on 4 June 2026. The Applicant does not agree that short-term rights would be sufficient in all cases or that rights are being sought for future convenience. The rights identified within the Order Limits have been assessed on a plot-by-plot basis and are required to facilitate the construction, operation, maintenance, inspection, renewal and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

access requirements of the Proposed Development. Permanent rights are only sought where they are necessary to enable the safe and efficient long-term operation of the infrastructure. Where land is only required during construction, temporary possession powers have been proposed. The Applicant has sought to minimise the extent of land and rights required through the iterative design process and will continue to engage with the landowner to understand and, where practicable, reduce impacts on the farming business. The Applicant does not agree that the rights sought would prevent the efficient and profitable operation of the holding, and compensation will be available where qualifying loss is incurred.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

143. AP 143 - William Nicholas Bird

143.1 Person with Interest in Land (PIL) Reference ID: 2394

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
There is a lack of necessity to acquire these rights when clearly short term rights would suffice. There are a number of locations where rights are looking to be acquired just for future convenience of the project. This disproportionately prevents efficient and profitable running of the farm in the future. There has been no consideration of any alternatives to minimize the effect on property rights. No consultation with landowners has been taken seriously and they cannot show where any discussions have been taken into account. Insufficient negotiations have been made to discuss the Heads of terms, they cannot show where any discussions have been taken into account when drawing up these very generic and wide spread heads of terms.	Summary of Objection The Applicant understands that William Nicholas Bird's objection raises the same three principal concerns as those set out by Jane Sarah Bird (AP142): (1) it is not necessary to acquire the rights sought from the AP, (2) there has been no consideration of alternatives, and no evidence that discussions have been taken into account, and (3) that insufficient negotiations have been undertaken on the Heads of Terms, which are said to be overly generic. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, restrictive covenant, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project. Consolidated Response The Applicant has met with the AP's representative, Brooks Leney, on multiple occasions to negotiate and progress the HoTs, most recently at a meeting held on 15 June 2026. Revised Terms will be issued in due course and the Applicant continues to engage with the AP's agent. The AP's representatives also attended an Agent's Group meeting with Fisher German and National Grid on 4 June 2026. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would

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Applicant's Response

reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

The Applicant does not agree that short-term rights would be sufficient in all cases or that rights are being sought for future convenience. The rights identified within the Order Limits have been assessed on a plot-by-plot basis and are required to facilitate the construction, operation, maintenance, inspection, renewal and access requirements of the Proposed Development. Permanent rights are only sought where they are necessary to enable the safe and efficient long-term operation of the infrastructure. Where land is only required during construction, temporary possession powers have been proposed. The Applicant has sought to minimise the extent of land and rights required through the iterative design process and will continue to engage with the landowner to understand and, where practicable, reduce impacts

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

on the farming business. The Applicant does not agree that the rights sought would prevent the efficient and profitable operation of the holding, and compensation will be available where qualifying loss is incurred.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary

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Applicant's Response

means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

144. AP 144 - David Michael Stacey

144.1 Person with Interest in Land (PIL) Reference ID: 5513

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The disruption to our daily work activities. We have no rights to object to the actions(it's our land), lack of compensation for any actions.	Summary of Objection The Applicant understands that David Michael Stacey's objection concerns the disruption to daily work activities caused by the Project, a perceived lack of ability to object given that it is his own land, and a lack of compensation for actions taken. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project. Consolidated Response The Applicant's land agent, Fisher German (Matthew Johnson), held a Heads of Terms meeting at the W+N offices on 24 February 2026 at which accommodation works were discussed, including the AP's desired crossing points and haul road positioning, so that the AP could continue to operate the land in the presence of the construction works. These have been included on the LIRA document, which is awaiting approval. Version 2 of the HoTs was issued in April 2026, although the Applicant understands that the current advice from the AP's agent is not to sign. The Applicant acknowledges the Affected Person's concerns regarding potential disruption to their daily activities and their view that they have limited ability to influence the exercise of the rights sought over their land. The Applicant notes that the powers sought through the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Order are subject to the statutory safeguards contained within the Planning Act 2008 and would only be exercised where necessary for the construction, operation and maintenance of the Proposed Development.

The Applicant has sought to minimise impacts through the design of the Project and ongoing engagement with affected persons. In the event that rights are acquired or exercised, affected persons would be entitled to compensation in accordance with the statutory compensation code. This includes compensation for the acquisition of land or rights and for qualifying losses arising from the exercise of those powers, assessed in accordance with established legal principles. The Applicant remains committed to continuing engagement to understand and, where reasonably practicable, minimise disruption to the landowner's activities.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

145. AP 145 - Gavin Richard Clark

145.1 Person with Interest in Land (PIL) Reference ID: 2309

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Despite raising questions and concerns directly in person with National Grid / representatives we are yet to receive answers to eg the working hours of the set down site at Church Lane, Margaretting ie no working/activity outside of Monday to Friday 9am to 5pm. Any potential impact to internet signal from nearby pylons noting we run a business etc	Summary of Objection The Applicant understands that Gavin Richard Clark's objection concerns two specific matters raised directly with National Grid and its representatives, to which answers have not yet been received: (1) whether the working hours of the set-down site at Church Lane, Margaretting require no working or activity outside of Monday to Friday, 9am to 5pm); and (2) the potential impact on internet signal from nearby pylons, given that the AP runs a business from the property. Land Rights Sought The Applicant understands that the AP holds freehold subsoil interests within the Project Order Limits. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. Consolidated Response The Applicants representative has been in ongoing engagement with the AP, with recent meeting on 2 June 2026 to discuss the HOTs in more detail and impact on the APs property. The meeting covered a number of topics including concerns regarding traffic management, holding areas for vehicles and impact on business that is ran from the property. In response to the AP's specific concerns about working hours, the Applicant confirms that there are no site-specific or bespoke working hours proposed for Church Lane, Margaretting. Construction activities at this location would be undertaken in accordance with Requirement 7 of the Draft DCO, which applies consistently across the Project. The requirement provides for core construction working hours of 07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, bank holidays and other public holidays, together

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

with defined exceptions for particular activities where operational, safety or engineering considerations necessitate working outside those hours.

In response to the AP's concern about internet and signal interference, the Applicant notes that the proposed overhead line is designed to National Grid's technical specifications which include the requirements of BS 5049-34, along with other equipment-specific standards such as BS EN 604375 for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[APP-330]** and would present no issues with TV, Wi-Fi or mobile interference under normal operating conditions.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[REP3-034]** and would present no issues with for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions.

Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs, which include both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) **[REP3-034]**. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project.

APs have also objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to animal health. In response, the Applicant notes that, as well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 which states: "There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences." Although horses are not directly mentioned, there is no evidence to suggest they are any different to other animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project will be designed in accordance with the principles of the Governments Code of Practice 'Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields' to ensure these are mitigated, which include equestrian activities.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

146. AP 146 - Karen Elizabeth Clark

146.1 Person with Interest in Land (PIL) Reference ID: 1890

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Despite raising questions and concerns directly in person with National Grid / representatives we are yet to receive answers to eg the working hours of the set down site at Church Lane, Margaretting ie no working/activity outside of Monday to Friday 9am to 5pm. Any potential impact to internet signal from nearby pylons noting we run a business etc	Summary of Objection The Applicant understands that Karen Elizabeth Clark's objection raises the same concerns as those set out by Gavin Richard Clark (AP145): that questions and concerns raised directly with National Grid and its representatives about working hours at the Church Lane, Margaretting set-down site and the potential impact on internet signal from nearby pylons have not been answered. The AP notes that a business is run from the property. Land Rights Sought The Applicant understands that the AP holds subsoil freehold interests within the Project Order Limits. The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. Consolidated Response The Applicants representative has been in ongoing engagement with the APs spokesperson, with recent meeting on 2 June 2026 to discuss the HOTs in more detail and impact on the APs property. The meeting covered a number of topics including concerns regarding traffic management, holding areas for vehicles and impact on business that is ran from the property. In response to the AP's specific concerns about working hours, the Applicant confirms that there are no site-specific or bespoke working hours proposed for Church Lane, Margaretting. Construction activities at this location would be undertaken in accordance with Requirement 7 of the Draft DCO, which applies consistently across the Project. The requirement provides for core construction working hours of 07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, bank holidays and other public holidays, together with defined exceptions for particular activities where operational, safety or engineering considerations necessitate working outside those hours. In response to the AP's concern

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

about internet and signal interference, the Applicant confirms that the proposed overhead line is designed to National Grid's technical specifications which include the requirements of BS 5049-34, along with other equipment-specific standards such as BS EN 604375 for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[APP-330]** and would present no issues with TV, Wi-Fi or mobile interference under normal operating conditions.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

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completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have questioned whether the Project may interfere with existing service connections, such as aurally-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report **[REP3-034]** and would present no issues with for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions.

Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs, which include both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and

adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) **[REP3-034]**. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS

Please summarise (in no more than 1500 words) the reason(s) for your objection

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EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project.

APs have also objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to animal health. In response, the Applicant notes that, as well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 which states: "There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences." Although horses are not directly mentioned, there is no evidence to suggest they are any different to other animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project will be designed in accordance with the principles of the Governments Code of Practice 'Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields' to ensure these are mitigated, which include equestrian activities.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

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strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

147. AP 147 - Michael John Golding

147.1 Person with Interest in Land (PIL) Reference ID: 25624

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP. The Applicant nonetheless sets out the land rights sought and its response as follows. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which the AP holds an interest. Consolidated Response The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle. The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by application and therefore forms part of the development consent sought. The Applicant therefore remains satisfied that there is a clear and compelling justification for the inclusion of compulsory acquisition powers within the Order and that the statutory tests for their grant have been fully met.

148. AP 148 - Benjmain Richard Coode-Adams

148.1 Person with Interest in Land (PIL) Reference ID: 1030

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I notice that the information you are asking for is not freely available nor searchable and you use acronyms with abandon. For this reason your consultation process is flawed and should be restarted with forms people can actually use. I am Ben Coode-Adams, farming partner of G&S Coode-Adams Farm Partnership, operating Feering Bury Farm and Coggeshall Hall Farm in Essex. Three proposed towers - TB077, TB078 and TB079 - fall on farm land. TB080 lies immediately across the road from the boundary and will cause construction-phase disruption to access and operations. This objection is confined to land rights interference under sections 122 and 123 of the Planning Act 2008. No environmental objection is raised. The DCO proposes permanent acquisition of rights, temporary possession and intrusive survey powers at TB077, TB078 and TB079. TB079 is particularly damaging: it falls within fields planted with early blackcurrant varieties entirely dependent on a permanently installed frost-protection and sprinkler irrigation	Summary of Objection The Applicant understands that Benjamin Richard Coode-Adams, as farming partner, objects on the basis that pylons TB077, TB078, and TB079 are proposed on the farmland and pylon TB080 is in the immediate vicinity. The AP raises concerns about the acquisition of permanent rights over the farmland, including the associated permanent access route, and specifically objects on the grounds that the works will have a significant and lasting impact on the blackcurrant enterprise operated from the farm. The blackcurrant growing area requires a frost protection and irrigation system to operate, which has already had to be relocated for the purposes of the Project, and the AP contends that the works will disrupt its operation for a period of approximately eight years, causing quantified financial losses. The AP further objects on the basis that the Applicant has not properly considered alternatives to minimise the impact on the farm and on the blackcurrant enterprise, and that Sections 122 and 123 of the Planning Act 2008 are not satisfied. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure) and Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
system. Disruption cascades across the whole enterprise. No other part of the farm has frost protection and the early variety cannot be relocated. Yield decline begins before construction, as bushes must be retained beyond their productive lifespan. Total impact spans approximately eight years — the construction period plus a four-year replanting lag. Some 14 hectares will be lost, eliminating a stewardship scheme worth approximately £56,000. Quantified losses include approximately £150,000 per year in lost blackcurrant revenue for up to eight years; approximately £100,000 to relocate and £100,000 to reinstate frost infrastructure; approximately £20,000 per year from farm severance; and approximately £24,000 per year in management costs. Surveys cause further losses through destroyed bushes, compacted headlands and yield suppression. Construction access along Coggeshall Hall drive generates claims for wear, nuisance and safety risk. Ditch disruption may impede run-off to the farm reservoir. TB080 adds construction-phase access disruption. Under section 122 and DCLG Guidance paragraph 8, the applicant must demonstrate that all reasonable alternatives have been explored and that compulsory acquisition is necessary and proportionate. The siting of TB079 within frost-protected fields is not the	The Applicant's land agent, Fisher German (Matthew Johnson), issued initial Heads of Terms to the AP in October 2025 and a revised version 2 was issued in April 2026. A site meeting has been held with the landowners and their agent, Whirledge & Nott, to discuss the Heads of Terms, accommodation works, and in particular how to manage the blackcurrant farming enterprise throughout the construction period. The Applicant remains committed to continuing those discussions with the AP and their agent. In relation to the specific pylon references and the routeing and siting decisions in this location, the Applicant notes that the relevant pylons are TB079, TB080, and TB081 (the pylon references provided are from earlier rounds of consultation). The route in this location was considered very carefully given the sensitivity of the farming operations and the existing blackcurrant enterprise. Alternatives were considered, including a northern realignment, which would have resulted in increased impacts on Grade I and Grade II* listed buildings and a sewage works, along with adverse residential effects. Southern and eastern alternatives would have transferred impacts to listed buildings and residential properties, would have affected a consented solar development, a proposed housing development, and would have resulted in a materially longer route. Micro-siting of individual pylons was considered but would not be entirely viable in all cases without requiring the use of excessively tall pylons, which would increase visual impacts. Following post-consultation engagement, construction access roads were amended to minimise the impact on the irrigation system as far as practicable. Permanent infrastructure has been positioned to field edges wherever possible. The Applicant acknowledges the AP's concern about the bellmouth crossing location and confirms that this cannot be relocated due to highway safety requirements. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
only workable alignment. A modest repositioning could avoid or substantially reduce cascading enterprise losses. No evidence shows alternatives were assessed and rejected. The cumulative impact of three towers together with TB080's proximity renders the interference disproportionate to any marginal advantage of the chosen alignment. Section 122(3) and DCLG Guidance paragraph 13 require the Secretary of State to be satisfied there is a compelling case in the public interest. Parliament has consistently held that land should be taken compulsorily only where public benefit clearly outweighs private loss. Private loss here is very substantial: destruction of a specialist enterprise dependent on unique fixed infrastructure, financial losses well in excess of £1 million, and permanent imposition of rights over productive freehold land. No assessment weighs these losses against the incremental benefit of the chosen positions. Specific alternatives warranting investigation include repositioning TB079 away from the frost-irrigated fields; repositioning TB077 and TB078 to reduce cumulative impact; provision of replacement frost infrastructure within the consented scheme; engineering measures to protect the ditch and reservoir; and modification of the construction access route.	demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

No evidence was provided that any of these was properly examined.

The conditions of sections 122 and 123 of the Planning Act 2008 have not been met. I respectfully request that the Secretary of State decline to include compulsory acquisition

provisions in the DCO in respect of my land at TB077, TB078 and TB079, or alternatively modify the DCO to exclude or substantially reduce the impact on the frost-protection system and the blackcurrant enterprise at Feering Bury Farm and Coggeshall Hall Farm.

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

149. AP 149 - Benjamin Richard Coode-Adams

149.1 Person with Interest in Land (PIL) Reference ID: 1030

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I am Ben Coode-Adams, sole owner of [REDACTED]. This is a Grade II listed sixteenth-century timber-framed barn in separate personal ownership from the adjoining G&S Coode-Adams Farm Partnership. No pylon towers are proposed on the barn land itself. This objection is made as the owner of an interest in land whose peaceful enjoyment, heritage significance, amenity and asset value will be materially and permanently interfered with by the authorised works. It is limited solely to interference with my rights and interests in land under the Planning Act 2008 and DCLG Guidance. No environmental objection is advanced. Towers TB075, TB076, TB077, TB078 and TB079 are located on the adjacent farm landholding; TB076 lies immediately across from the barn boundary. All four towers will be visible from the barn, its curtilage and its approach. The barn is a Grade II listed building of sixteenth-century origin whose	Summary of Objection The Applicant understands that Benjamin Richard Coode-Adams, in his capacity as owner of a Grade II listed sixteenth-century timber-framed barn at Feering Bury Farm, objects on the basis that five pylons (TB075–TB079) would be visible from the barn and would cause permanent and irreversible harm to the heritage setting of this listed building. The AP further objects on the basis that the construction haul road would run for approximately four years in front of the barn, generating noise, vibration, and dust, and that the value of the barn would be permanently reduced as a result. The AP contends that the tests under Sections 122 and 123 of the Planning Act 2008 are not met, and that an alternative route for the haul road should have been pursued. The AP also raises concern about the positioning of permanent infrastructure in proximity to the listed building. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure) and Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response The Applicant's land agent, Fisher German (Matthew Johnson), issued initial Heads of Terms to the AP in October 2025 and a revised version 2 was issued in April 2026. A site meeting has been held with the landowners and their agent, Whirledge & Nott, to discuss

Please summarise (in no more than 1500 words) the reason(s) for your objection

heritage significance, character and market value are

inseparable from the open agricultural landscape in which it has stood for five centuries. The permanent erection of six 50-metre steel lattice pylons in close proximity will

irreversibly alter and diminish that setting in a manner which cannot be mitigated and from which the property cannot recover. This constitutes lasting harm to my interest in the property and an irrecoverable diminution in both heritage significance and market value. No compensation framework has adequately addressed this category of loss for a listed building affected by visible infrastructure of this scale.

During construction, the near-continuous temporary haul road — typically 8 metres wide with a 21-metre cross-section including topsoil storage and demarcation fencing — will run close to the property. National Grid and contractor vehicles are excluded from existing public roads and directed onto this haul road, carrying heavy construction traffic for the estimated four-year build. A new bridge across the river is to be constructed nearby. The haul road, its plant, heavy vehicles and bridge construction will generate sustained noise, vibration, dust, light pollution and disturbance in close proximity to the barn throughout that entire period. The cumulative

Applicant's Response

the HoTs and accommodation works. The Applicant remains committed to continuing those discussions with the AP and their agent.

In relation to the specific pylon references and the routeing and siting decisions in this location, the Applicant notes that the relevant pylons are TB079, TB080, and TB081 (the pylon references provided are from earlier rounds of consultation). The route in this location was considered very carefully given the sensitivity of the farming operations and the existing blackcurrant enterprise. Alternatives were considered, including a northern realignment, which would have resulted in increased impacts on Grade I and Grade II* listed buildings and a sewage works, along with adverse residential effects. Southern and eastern alternatives would have transferred impacts to listed buildings and residential properties, would have affected a consented solar development, a proposed housing development, and would have resulted in a materially longer route. Micro-siting of individual pylons was considered but would not be entirely viable in all cases without requiring the use of excessively tall pylons, which would increase visual impacts. Following post-consultation engagement, construction access roads were amended to minimise the impact on the irrigation system as far as practicable. Permanent infrastructure has been positioned to field edges wherever possible. The Applicant acknowledges the AP's concern about the bellmouth crossing location and confirms that this cannot be relocated due to highway safety requirements.

Noise and vibration is assessed in **6.14 Environmental Statement Chapter 14 Noise and Vibration [Revision B]**. Noise and Vibration effects have been assessed at this location and significant adverse effects are not expected during either construction or operational phases. The Applicant is also committed to implementing the mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision G]**, which include giving appropriate advance notice of works likely to generate significant noise or vibration.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight

Please summarise (in no more than 1500 words) the reason(s) for your objection

impact on amenity, use and letting value is substantial and prolonged. It falls on a property with no towers on its own land and which has made no agreement with the applicant.

Under section 122 of the Planning Act 2008 and DCLG Guidance paragraph 8, interference with rights in land must be necessary and proportionate and all reasonable alternatives must have been explored. The applicant has not demonstrated that haul road routing or tower positions were assessed with specific regard to the setting of this listed building. Under DCLG Guidance paragraph 13, compelling evidence must show public benefit outweighs private loss. The permanent and irrecoverable harm to the heritage setting of a Grade II listed sixteenth-century barn, combined with four years of intensive construction disturbance and consequent falls in asset and letting value, constitute a private loss that has not been weighed against the incremental benefit of the chosen alignment. Under DCLG Guidance paragraph 10 and Article 1 of the First Protocol to the ECHR, interference with peaceful enjoyment of property must be lawful, necessary and proportionate. That balance has not been struck.

I request that the examining authority require the applicant to assess the impact of the authorised works on Feering Bury Farm Barn

Applicant's Response

where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
as a Grade II listed building and demonstrate that tower positions and haul road routing were properly considered with regard to the heritage and amenity interests in this property. I note you say 1500 words but you actually mean 4000 characters including spaces. This form is appalling for the use of acronyms and jargon and asking for information that is not available.	reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and 7.2 Outline Code of Construction Practice **[Revision G]**. The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant confirms that the Barn Of Feeringbury Farm, 60 Metres South (NHLE 1123829) has been assessed, including the assessment of its setting and the consideration of the Project's alignment and associated works, within the historic environment assessment presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report **[APP-209]**, 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables **[AS070]**, 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets **[APP-215]**, and 6.11 Environmental Statement Chapter 11 - Historic Environment **[AS-068]**. The assessment has been informed by site visits, aerial and street-view imagery and viewpoint assessment. The Applicant has concluded that while during the construction phase, there is likely to be a temporary moderate adverse significance of effect on the asset and it would experience Mid Less Than Substantial Harm, during the operation phase there is likely to be a direct, permanent minor adverse significance of effect (not significant) on the asset and it would experience Lower Less Than Substantial Harm.

Where a mid less than substantial harm conclusion has been reached for the construction phase impacts on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets **[APP-215]**, these impacts would be temporary, and the temporary construction works elements of the Project would be reinstated following construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, the Applicant has considered embedded mitigation. 5.15 Design Development Report **[APP-122]** provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project. Changes to temporary construction works were considered as part of this. 5.15 Design Development Report **[APP-122]** addresses the main changes requested and those

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socioeconomic effects, engineering feasibility and risks, cost and programme, amongst other factors.

The Applicant has also included standard mitigation during the construction phase to reduce change to setting for designated assets in 7.2 Outline Code of Construction Practice **[REP5-139]**. Commitments in Table 6.1, such as H06 which sets out the commitment to maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches) are an element that informs the settings of heritage assets. In addition, commitments including GG07, GG17, GG26, AQ01, NV01, NV02 and NV05 will control construction works to ensure disturbance is reduced as much as possible, which will contribute to reducing change within the settings of heritage assets. 7.4 Outline Landscape and Ecological Management Plan **[REP5-157]** includes measures to retain and reinstate landscape, ecological and historic landscape features, which inform the settings of heritage assets. Changes to the setting resulting from construction activities would be temporary and would be reversed once the construction phase is completed.

No additional mitigation measures are proposed during the construction phase as any measures, such as tall construction hoardings, designed to lessen the visual impact of the Project would themselves be of a scale that would be a visually adverse alteration to the setting of the asset.

150. AP 150 - Mark John Putnam

150.1 Person with Interest in Land (PIL) Reference ID: 6008

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed acquisition of rights over my land and property and submit that National Grid has failed to satisfy the requirements of Sections 122 and 123 of the Planning Act 2008 and the principles set out in the Department for Communities and Local Government Guidance, "Planning Act 2008: Guidance related to procedures for compulsory acquisition" (September 2013). Section 122 requires that compulsory acquisition powers should only be granted where the land or rights sought are necessary for the development and where there is a compelling case in the public interest. The Guidance further states that applicants must demonstrate that all reasonable alternatives have been considered and that any interference with private property rights must be proportionate, justified and no more than is reasonably required. I do not believe National Grid has demonstrated that the proposed acquisition of rights affecting my property is necessary or proportionate. Nor do I believe that National Grid has established the compelling case in	Summary of Objection Mark John Putnam's objection is detailed and wide-ranging. The AP's property is a bungalow adjacent to the only available gap or "pinch point" a corridor of approximately 120 metres — through which the haul road and underground cable works must pass. The AP objects principally on the grounds that: the haul road and underground cable installation will run for approximately four years in very close proximity to his home; the works will involve night-time working; the property has already been blighted and its value reduced by more than £120,000, rendering it unsaleable at open market value; the Applicant has refused to purchase the property at its unaffected value, causing significant financial hardship and emotional distress; and there has been no meaningful engagement on site-specific impacts or alternatives for routing the works so as to avoid the pinch point. The AP contends that the tests under Sections 122 and 123 of the Planning Act 2008 are not satisfied. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 4 (overhead line and underground cable infrastructure). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 4 (overhead line and underground cable infrastructure). The Applicant is not seeking any rights in its own right from this AP directly for the National Grid element: the relevant rights are being acquired by UKPN, who are actively engaging with the AP. No version 2 Heads of Terms have been sent to the AP by National Grid in those circumstances. Consolidated Response In relation to the routing of the works through the pinch point in this location, the Applicant notes that this section of the Project relates to the Great Horkesley cable route. The pinch

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
the public interest required to justify the severe impact that this project is having and will continue to have on my family, our home and our property rights. National Grid has not adequately demonstrated why the proposed cables must be routed through or immediately adjacent to my property. Alternative routes, technologies and methods appear to be available. In particular, alternatives involving HVDC technology, offshore routing and subsea options have been dismissed primarily on the basis of cost. However, the assessment of those costs has been undertaken by National Grid itself and I do not believe sufficient evidence has been provided to demonstrate that alternatives have been evaluated in a transparent, objective and balanced manner which properly weighs cost against the substantial impacts imposed on affected landowners. The Government's Guidance states that applicants should demonstrate that all reasonable alternatives have been considered before seeking powers to interfere with private land rights. National Grid has failed to demonstrate that less intrusive alternatives have been fully explored and exhausted before seeking compulsory powers affecting my property. My family home is a small two-bedroom bungalow located immediately adjacent to a	point referred to by the AP is the only available gap by which to cross The Causeway without materially increasing the total route length, causing significant impacts on important ecological receptors, or crossing private residential gardens. The Applicant has considered all available alternatives in this location and is satisfied that no practicable alternative routing exists which would avoid or significantly reduce the proximity of the works to the AP's property. An Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and has assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, socio-economics, health and wellbeing, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and documents including 7.2 Outline Code of Construction Practice (OCoCP) [Revision G] and 7.3 Outline Construction Traffic Management Plan (CTMP) [Revision F]. The OCoCP includes a range of good practice and other management measures associated with construction noise, air quality and community liaison. For example, measure GG35 in the 7.2 Outline Code of Construction Practice [Revision G] states that members of the community and local businesses will be kept informed regularly of the works through active community liaison. As previously explained in 8.8.1 Applicant's Comments on Written Representations [REP2-209], the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public

Please summarise (in no more than 1500 words) the reason(s) for your objection

narrow strip of land which National Grid refers to as a “pinch point” measuring approximately 120 metres in width. National Grid proposes to use this entire corridor for a haul road and the installation of underground high-voltage electricity cables. The scale, intensity and duration of these activities immediately next to our home will have an exceptional and disproportionate impact on our property rights and our ability to enjoy our home.

The proposed works will involve extensive construction activity, heavy machinery, excavation works, vehicle movements and associated disturbance immediately adjacent to our property. We have also been advised that much of the work will take place during night-time periods. The prospect of major construction works occurring directly next to our family home, including at night, raises serious concerns regarding noise, disturbance and loss of sleep. My wife, our **[REDACTED]** child and I will be subjected to prolonged disruption affecting our daily lives, wellbeing and ability to enjoy the peaceful occupation of our home.

The impact of this project extends far beyond temporary inconvenience. The project has already caused severe and demonstrable financial harm to my family through the effective blighting of our property.

Following the announcement of the project, we actively attempted to sell our home

Applicant's Response

interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is

Please summarise (in no more than 1500 words) the reason(s) for your objection

through multiple estate agents. We initially marketed the property at the values recommended by those agents and subsequently reduced the asking price by more than £120,000 (approximately 33%) in an effort to secure a sale. Despite these substantial reductions, we were unable to find a buyer. Feedback received consistently indicated that prospective purchasers were deterred by the potential presence of the transmission infrastructure and/or the proposed works associated with this project.

As a result, our home has become effectively unsaleable except at a very substantial financial loss. We estimate that the loss in value attributable to the project significantly exceeds £120,000. This is not a speculative concern; it is a real and ongoing financial impact that has already materially affected our property rights and financial security.

The effect of the scheme has therefore gone significantly beyond ordinary inconvenience. It has effectively removed our freedom to move home and has trapped us in a property which has suffered severe planning blight. The resulting financial uncertainty has caused considerable distress, anxiety and mental health issues for my family.

Recognising the serious impact the project was having upon our property, we requested that National Grid purchase our home at its unaffected market value. National Grid

Applicant's Response

limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
refused. As a result, we remain exposed to the continuing effects of blight, uncertainty and loss while being denied any practical means of mitigating the harm caused by the scheme. I am also concerned that National Grid has not provided sufficient clarity regarding precisely what land rights are required, the extent of those rights, the duration of any occupation, the specific activities that may be undertaken on the land, or the long-term restrictions that may apply following construction. This lack of certainty has left my family in a prolonged state of limbo. We are unable to make informed decisions regarding our future, our finances or our property because key information remains uncertain. The continuing uncertainty surrounding the project has imposed a significant emotional and psychological burden on my family. The prolonged inability to move forward with our lives, coupled with the financial losses already suffered and the prospect of years of disruption, has had a serious adverse impact on our mental wellbeing and quality of life. The Guidance accompanying the Planning Act makes clear that there must be a compelling case in the public interest before compulsory acquisition powers can be granted. It also requires a fair balance to be struck between the public benefits of a project	from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also

Please summarise (in no more than 1500 words) the reason(s) for your objection

and the private losses imposed on those affected.

In my case, National Grid seeks powers affecting land immediately adjoining my family home and land within my boundary whilst imposing a level of disruption, uncertainty, financial loss and loss of amenity that is exceptional when compared with the wider public benefit obtained from using this particular corridor. The burden imposed upon my family is disproportionate and National Grid has failed to demonstrate why such a severe interference with our rights is necessary when alternative solutions exist. The Guidance also requires consideration of the rights protected by Article 1 of the First Protocol to the European Convention on Human Rights, namely the peaceful enjoyment of possessions, and Article 8, which protects the right to respect for private and family life and the home.

The proposed interference with my property rights is substantial. The project has already caused severe financial harm through property blight, has rendered our home effectively unsaleable, has prevented us from moving home without suffering a major financial loss, and threatens years of disruption immediately adjacent to our property. The interference with our family life will be equally significant due to the anticipated noise, disturbance, loss of

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says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-

Please summarise (in no more than 1500 words) the reason(s) for your objection

amenity, uncertainty and stress associated with the works. The scale and intensity of these works in such close proximity to our home will have a severe impact on our property rights and our ability to enjoy our home.

In these circumstances, I do not believe National Grid has demonstrated that the proposed interference with my rights is the minimum necessary to achieve the objectives of the scheme. Nor has it demonstrated that less intrusive alternatives have been properly exhausted. Consequently, I do not believe that the required balance between the public interest and private rights has been achieved.

For all of the reasons set out above, I submit that National Grid has failed to satisfy the statutory tests contained within Sections 122 and 123 of the Planning Act 2008. The acquisition of rights affecting my property has not been shown to be necessary, proportionate or justified by a compelling case in the public interest. Accordingly, I object to the proposed interference with my land and property rights and respectfully request that the powers sought over my property be refused.

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statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

151. AP 151 - Frederica Susan Chisolm Robins

151.1 Person with Interest in Land (PIL) Reference ID: 8681

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I am Frederica Robins, joint owner of [REDACTED] a Grade II listed sixteenth-century timber-framed barn held in separate personal ownership from the adjoining G&S Coode- Adams Farm Partnership. No pylon towers are proposed on the barn land. This objection is made as joint owner of an interest in land whose peaceful enjoyment, heritage significance, amenity and asset value will be materially and permanently interfered with by the authorised works. It is limited to interference with my rights and interests in land under the Planning Act 2008 and DCLG Guidance. No environmental objection is advanced. Towers TB075, TB076, TB077, TB078 and TB079 are located on or adjacent to the neighbouring farm landholding; TB076 lies immediately across from the barn boundary. All five towers will be directly and permanently visible from the barn, its curtilage and its approach. The barn is a Grade II listed building of sixteenth-century origin whose heritage significance, character and market value are inseparable from the open	Summary of Objection The Applicant understands that Frederica Susan Chisolm Robins is a joint owner of the Grade II listed sixteenth-century timber-framed barn at Feering Bury Farm and objects on substantially the same grounds as Benjamin Richard Coode-Adams (AP149) in his capacity as barn owner: that the Project will cause permanent harm to the heritage setting of the listed barn due to the proximity of new pylons; that the construction haul road will generate noise, vibration, and dust; that the value of the barn has been, and will continue to be, adversely affected; and that the tests under Sections 122 and 123 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response The Applicant's land agent, Fisher German (Matthew Johnson), issued initial Heads of Terms to the AP in October 2025 and a revised version 2 was issued in April 2026. Multiple meeting requests were sent to the AP's agent, Whirledge & Nott, the most recent of which was sent on 18 May 2026. At the date of preparation of this response, no meeting with the AP's agent had taken place with respect to this AP's specific interests. However, a meeting

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agricultural landscape in which it has stood for centuries. The permanent erection of five 50-metre steel lattice pylons in close proximity will irreversibly alter and diminish that setting in a manner which cannot be mitigated and from which the property cannot recover. This constitutes lasting harm to my interest in the property and an irrecoverable diminution in both heritage significance and market value. No compensation framework has adequately addressed this category of loss for a listed building so directly affected by infrastructure of this scale.

During construction, the near-continuous temporary haul road - typically 8 metres wide with a 21-metre cross-section including topsoil storage and demarcation fencing - will run close to the property and its access. National Grid and contractor vehicles are excluded from existing public roads and directed onto this haul road, carrying heavy construction traffic for the estimated four-year build. A new bridge across the river is to be constructed nearby. The haul road, its plant, heavy vehicles and bridge works will generate sustained noise, vibration, dust, light pollution and disturbance in close proximity to the barn throughout that period. The cumulative impact on amenity, use and letting value is substantial and prolonged. This burden falls on a property that has made no agreement

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with Whirlledge & Nott, acting on behalf of all of their clients including this AP, took place on 4 June 2026, and the Applicant is committed to continuing engagement with the AP and their agent to progress matters.

In relation to the AP's concerns about noise, vibration, and construction impacts, the Applicant's environmental assessment team has assessed these matters. The noise and vibration impacts associated with construction activities at this location have been assessed in accordance with the relevant guidance and standards, and the assessment concludes that there would be no significant adverse noise or vibration effects at the barn or associated residential properties as a result of the construction works. The Applicant is committed to implementing the mitigation measures set out in the Outline Code of Construction Practice, which include giving appropriate advance notice of works likely to generate significant noise or vibration. In relation to the routeing and siting considerations, the Applicant has considered realignment alternatives in this location. A northern realignment would have transferred effects to Coggeshall Abbey and other Grade I and II* listed buildings. Southern and eastern alternatives would have transferred impacts to residential properties and a consented solar development, and would have resulted in a materially longer route.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

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with the applicant and will be continuously affected for the full duration of the works. Under section 122 of the Planning Act 2008 and DCLG Guidance paragraph 8, interference with rights in land must be necessary and proportionate and all reasonable alternatives must have been explored. The applicant has not demonstrated that haul road routing or tower positions were assessed with regard to the setting of this listed building. Under DCLG Guidance paragraph 13, compelling evidence must show public benefit outweighs private loss. The permanent and irrecoverable harm to the heritage setting of a Grade II listed sixteenth-century barn, combined with four years of construction disturbance and consequent falls in asset and letting value, is a private loss not weighed against the incremental benefit of the chosen alignment. Under DCLG Guidance paragraph 10 and Article 1 of the First Protocol to the ECHR, interference with peaceful enjoyment of property must be lawful, necessary and proportionate. That balance has not been struck. I request that the examining authority require the applicant to assess the impact of the authorised works on Feering Bury Farm Barn as a Grade II listed building and demonstrate that tower positions and haul road routing were properly considered with regard to the heritage and amenity interests in this property.

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Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

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Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

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Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision

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authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routing options. Those subsea routing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by

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consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant confirms that the Barn Of Feeringbury Farm, 60 Metres South (NHLE 1123829) has been assessed, including the assessment of its setting and the consideration of the Project's alignment and associated works, within the historic environment assessment presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report **[APP-209]**, 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables **[AS070]**, 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets **[APP-215]**, and 6.11 Environmental Statement Chapter 11 - Historic Environment **[AS-068]**. The assessment has been informed by site visits, aerial and street-view imagery and viewpoint assessment. The Applicant has concluded that while during the construction phase, there is likely to be a temporary moderate adverse significance of effect on the asset and it would experience Mid Less Than Substantial Harm, during the operation phase there is likely to be a direct, permanent minor adverse significance of effect (not significant) on the asset and it would experience Lower Less Than Substantial Harm.

Where a mid less than substantial harm conclusion has been reached for the construction phase impacts on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets **[APP-215]**, these impacts would be temporary, and the temporary construction works elements of the Project would be reinstated following construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, the Applicant has considered embedded mitigation. 5.15 Design Development Report **[APP-122]** provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project. Changes to temporary construction works were considered as part of this. 5.15 Design Development Report **[APP-122]** addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socioeconomic effects, engineering feasibility and risks, cost and programme, amongst other factors.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant has also included standard mitigation during the construction phase to reduce change to setting for designated assets in 7.2 Outline Code of Construction Practice [REP5-139]. Commitments in Table 6.1, such as H06 which sets out the commitment to maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches) are an element that informs the settings of heritage assets. In addition, commitments including GG07, GG17, GG26, AQ01, NV01, NV02 and NV05 will control construction works to ensure disturbance is reduced as much as possible, which will contribute to reducing change within the settings of heritage assets. 7.4 Outline Landscape and Ecological Management Plan [REP5-157] includes measures to retain and reinstate landscape, ecological and historic landscape features, which inform the settings of heritage assets. Changes to the setting resulting from construction activities would be temporary and would be reversed once the construction phase is completed. No additional mitigation measures are proposed during the construction phase as any measures, such as tall construction hoardings, designed to lessen the visual impact of the Project would themselves be of a scale that would be a visually adverse alteration to the setting of the asset.

152. AP 152 - Donna Chantry

152.1 Person with Interest in Land (PIL) Reference ID: 7604

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Norwich to Tilbury project will totally obliterate our countryside, people's homes, affecting wildlife and for no reason there are alternatives like we have already sent over to you. Meetings and webinars were arranged, and those who attended were unanimous in their opposition to the Pylon scheme. Regrettably, our concerns fell on deaf ears. Subsequently, a second consultation emerged, seemingly designed to fulfill checkboxes on National Grid's end, without a genuine consideration of our pleas for offshore or underground alternatives. At a personal level, my family and I are already struggling with the project's impact. The prospect of unsightly pylons marring our countryside and disrupting wildlife habitats deeply troubles us. Should National Grid proceed, the installation of 50-meter-high pylons would undeniably disrupt our local community. Traffic, noise, pollution, and potential health implications all loom large, despite National Grid's assurances of safety.	Summary of Objection The Applicant understands that Donna Chantry's objection raises the following concerns: that the Project will "obliterate the countryside" through the installation of large overhead pylons; that meetings and webinars have been held at which her concerns were expressed but ultimately ignored; that no proper consideration has been given to offshore or underground alternatives; that property values in the vicinity have reduced by approximately 30%; that the AP is the owner of a Grade II listed farmhouse, the heritage setting of which will be harmed; and that there are impacts on wildlife, heritage, and the landscape that the Applicant has failed to adequately address. The AP also raises concerns about the health effects of electromagnetic fields on humans living in proximity to the new line. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure) only. Powers of temporary possession (Class 7) are sought for National Grid. Consolidated Response The Applicant's land agent, Fisher German, has made direct contact with the AP by door-knocking on 18 May 2026 and again on 6 June 2026. A meeting with the AP's agents took place on 20 April 2026 to negotiate version 2 of the Heads of Terms, with a National Grid representative in attendance. In relation to the AP's concerns about ecological impact, the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 - Ecology and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Concerns about cancer risks arising from close proximity to such installations only further our anxieties.

As homeowners, we find ourselves in a state of uncertainty. Selling our properties feels unfair to potential buyers, yet the prospect of residing here while awaiting what seems like an inevitable outcome is equally daunting. Recent visits by estate agents have delivered disheartening news — our homes are estimated to depreciate by 30 percent. Having all invested our time, hard efforts, and personal finances into our homes, this revelation is deeply unsettling. Unfortunately, expecting compensation from National Grid for affected properties along this route seems futile. Despite being a privately owned entity, National Grid operates without meaningful government intervention. As a custodian of a grad II listed farm house, i take pride in being a small part of brentwood’s rich heritage, However , the impending distruction of the current lanscape fills me will deep sadness and concerns for my homes legacy.

[REDACTED] Please do not let this project go through without looking at the alternatives!.

Applicant’s Response

Biodiversity [Revision C] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have Inform the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

Noise and vibration is assessed in **6.14 Environmental Statement Chapter 14 Noise and Vibration [Revision B]**. Noise and Vibration effects have been assessed at this location and significant adverse effects are not expected during either construction or operational phases. In relation to property value impacts, the Applicant acknowledges the AP's concern but reiterates that there is no reliable evidence that the Project causes a general reduction in property prices. Compensation for diminution in value is available only where the statutory Compensation Code applies. Perceived loss of value or generalised blight does not of itself give rise to a compensation entitlement.

As previously explained in 8.8.1 Applicant's Comments on Written Representations **[REP2-209]**, the Applicant acknowledges concerns regarding potential property value impacts but maintains that there is no reliable evidence that the Project causes a general reduction in property prices. Property values are influenced by multiple factors and are not a material planning consideration. Compensation for diminution in value is available only where the statutory Compensation Code applies, including injurious affection and statutory blight where the relevant legal tests are met. Perceived loss of value, loss of view or generalised blight do not of themselves give rise to compensation.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have objected to the Applicant's request to seek authorisation for powers of compulsory acquisition on grounds that the Project will be harmful to human health. Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with national guidance and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs, which include both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. The Applicant's approach ensures all of its transmission assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and Magnetic Field Compliance Report (Rev B) **[REP3-034]**. UK Government, acting on the advice of authoritative scientific bodies, has put in place appropriate measures to protect the public from EMF. These measures comprise compliance with the relevant exposure limits, and one additional precautionary measure, optimum phasing, applying to high voltage power lines. This policy is incorporated in NPS EN-5 (DESNZ, 2024a). Components associated with the Project would be fully compliant with the UK Government policies on EMFs. Specifically, all the EMFs produced

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

would be below the relevant exposure limits, and the proposed overhead lines would comply with the policy on optimum phasing. If these requirements are met, NPS EN-5's Simplified Route Map for dealing with EMFs states that 'EMF effects are minimal' and therefore, there would be no significant EMF effects resulting from the Project.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant believe this comment refers to Ellices (NHLE 1297247) and confirms that this listed building has been assessed following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment **[AS-068]**, 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables **[AS-070]** and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets **[APP-215]**. The assessment has been informed by site visits, aerial and street-view imagery. During the operation phase, the Applicant concluded there is likely to be minor adverse significance of effect (not significant) on the asset and it would experience Lower Less Than Substantial Harm, with the closest pylon being c. 265m south-west with buildings intervening.

153. AP 153 - Jeremy James Fisher

153.1 Person with Interest in Land (PIL) Reference ID: 9639

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: • There must be a compelling case in the public interest for compulsory acquisition. • The land or rights sought must be necessary for the development. • The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the	Summary of Objection The Applicant understands that Jeremy James Fisher's objection takes the form of a detailed professional report concerning the impact of the Project on the Faulkbourne Estate. The objection raises the following principal concerns: that eleven new pylons (TB097–TB113) are proposed on the Estate, in addition to six existing pylons, and that the cumulative impact on the Estate is disproportionate; that the associated haul roads and temporary construction works are unnecessarily intrusive and that alternative, less impactful haul road alignments have not been properly considered; that the rights sought are wider than necessary, particularly in relation to the extent of permanent purchase areas; that the Applicant's approach to biodiversity net gain ("BNG") land is opaque and the extent of land sought for that purpose is not clearly explained or justified; that the pre-application consultation process was inadequate; and that the powers of compulsory acquisition are sought prematurely, before voluntary negotiations have been adequately explored. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire both permanent rights (comprising Class 1 – permanent acquisition of land, Class 2 – overhead line infrastructure, Class 3 – underground cable infrastructure, Class 4 – overhead line and underground cable infrastructure, and Class 5 – access) and powers of temporary possession (Class 7). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought.

Please summarise (in no more than 1500 words) the reason(s) for your objection

scheme, as currently promoted, fails to satisfy these statutory requirements.

2. Overview of the Proposed Scheme and Impacts

The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. For example, the Faulkbourne Estate alone would be affected by 11 new pylons (TB97–TB113) together with significant haul roads and construction activity, in addition to the 6 from the Pelham to Rayleigh line that already cross the Estate under an Easement.

Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include:

- Severe disruption to farming operations
- Safety risks arising from construction routes
- Loss of residential amenity
- Interference with existing infrastructure and utilities
- Long-term landscape and environmental harm

Applicant's Response

Consolidated Response

The Applicant does not agree with the comment that there has been a failure to negotiate without resolution. The Applicant's land agent, Fisher German, issued the most recent version of the Heads of Terms in April 2026. Meetings with the AP's representative, Jeremy Fisher, have most recently been held on 2 June 2026 and on 1 July 2026. Those meetings have helped to address the AP's design amendment requests, including proposed amendments to haul road alignments, the routing of the overhead line, and the extent of permanent purchase areas. Requests are being actively reviewed by the design and engineering teams. The Applicant's position is that if suitable amendments can be implemented to address the AP's principal concerns, the AP is likely to agree to sign the Heads of Terms. At the most recent meeting, the Applicant advised Jeremy Fisher and his agent that a revised V3 Heads of Terms will be distributed shortly with a number of amendments to provide comfort where necessary. The Applicant will continue to engage meaningfully with the AP and their agent to continue negotiations and to explore options to optimise the route and access arrangements where possible.

In relation to the AP's specific concerns about disruption to farming operations, it is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known.

The Applicant has met with the landowner and their newly appointed agent on 2 June 2026 and 1 July 2026 on site. The Applicant anticipates reviewing the Estate's proposed crossing points once received and will endeavour to mitigate impacts on farming operations during construction. During construction, mitigation measures such as crossing points, suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery, will be created to enable farming operations to continue. Where

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: • National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. • Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, • haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and • the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. The Estate has offered to provide and manage BNG arising from the Scheme through carefully located sites across the Holding, at prevailing BNG	there may be potential to interrupt farming operations we would request specific concerns to be identified. The Limits of Deviation allow for localised adjustments to for example achieve separation from boundaries at a distance to allow machinery passage without folding. On the subject of farming, the AP raises concerns about the Project placing a haul road through the centre of a large field which might prevent the use of standard 38m machinery and require a complete redesign of drainage systems. In response, the Applicant is considering whether some adjustments to pylon positions around TB105 (within the LOD) can facilitate both movement of pylons to boundaries and reduce the effects arising from the access roads. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis. Prior to construction the Applicant will seek to undertake GPR surveys and request maps of utilities in order to better inform construction practices and minimise interference with existing infrastructure and utilities. In the case of the Faulkbourne Estate, the Applicant has already received the drainage field plans from the Estate and is awaiting the drainage plans to help inform design. The Applicant will continue with regular dialogue to ensure as much information on the existing infrastructure is obtained from the Estate. Detailed design work is ongoing but will meet relevant safety standards. In the case of the practical deliverability of installing a construction route over a Ford, this will be discussed with the Environment Agency and subsequently with the landowner to confirm any specific requirements regarding dates. The design is a matter that would be discussed with the contractors. In relation to the point about permanent disruption of agricultural land where temporary access could achieve the same objective, the Applicant is unclear what the AP refers to in this instance. There is only one area within the Faulkbourne Estate which is subject to permanent freehold acquisition (the CSE) and this acquisition is strictly limited to what is necessary for the development. Whilst, some accesses are a permanent right of access for occasional inspections, the Applicant has discussed specific amendments to these in discussion with the AP. In relation to the AP's comment about overly wide or intrusive haul roads, the design arrangement is to utilise haul roads to reduce the number of HGVs on narrow rural lanes, and utilise the wider road network. As such they are designed for two way HGV movement.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Credit values, although equally National Grid could consider the UK BNG Bank. The need to compulsorily acquire land for this purpose has not been established. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: • Permanent disruption of agricultural land where temporary access could achieve the same objective • Overly wide or intrusive haul roads • Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that:	The use of an approx. 8m wide road offers the most efficient design for traffic movement and requires adjacent land for the temporary storage of cleared topsoil and drainage attenuation arrangements. Where possible and without adding additional road distance we have responded to requests to seek to use existing tracks or follow boundaries though this is not always possible. At the Faulkbourne Estate, the Applicant has made some modifications in response to feedback, but some requests are not possible. They may be judged to add too much additional length, originate at an unsafe access point or not support crossover road crossings. Our contractors continue to look for efficiencies and in some locations may be able to reduce the road to the equivalent of single track with passing places. In relation to the AP's specific concerns about BNG land, the Applicant can confirm we are not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). Habitat creation and enhancement will be delivered within Environmental Areas, which are multi-functional areas within the Order Limits, where standard and embedded mitigation (such as landscape and visual mitigation) will be delivered alongside biodiversity gains. Any BNG deficit determined following detailed design will be delivered offsite through registered BNG providers, which could include the Faulkbourne Estate. The Applicant is open to continuing discussions over potential offsite BNG opportunities. In relation to the AP's concerns about the specific design features of the Project in this location, the Applicant confirms that the extent of land at the Fairstead cable sealing end ("CSE") compound has been reduced from earlier iterations. Haul road alignments in this location have previously been amended in response to feedback from the Estate. Further adjustments to pylon positioning are under active consideration. The Applicant acknowledges, however, that certain elements of the scheme are essential to the delivery of the Project in this location and cannot be moved or further reduced. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360). The Applicant does not agree with the comment that there is a lack of necessity for specific land interests. The Applicant has completed its design development which has resulted in a more compact design for the CSE to one end of the field (mentioned above). Often small,

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• The scheme imposes significant and concentrated burdens on specific landowners and communities • These burdens are not adequately mitigated or justified by the chosen route • The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives. A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: • A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors • Use of existing redundant pylon routes instead of constructing entirely new infrastructure • Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier consultations (2024–2025), it appears that National Grid has not sufficiently engaged with or incorporated these alternatives. This	awkward corners are left resulting in the normal practice of acquiring the whole field. The corners then being used to provide space for screen planting and potentially BNG. In light of the design outcome and following discussion with the Estate, the areas we would expect to retain are sufficient for soil storage and to establish screen planting, but be able to return between 3 to 4 Hectares to agricultural cropping. A similar reduction in retained land may be possible in the field to the south of the CSE subject to confirming the extent to which landscape planting is required. The following response was provided in 8.5.10 - 'The Applicant has looked at whether it can deliver its BNG land requirement elsewhere and it believes it can. Therefore, there will be approximately three hectares that the Applicant thinks can be return to agricultural use'. The Applicant acknowledges that the AP has put forward detailed responses as part of both the 2024 and 2025 consultations. The Applicant does not agree with the comment that the Applicant has not sufficiently engaged with or incorporated the alternatives proposed. The Applicant has reviewed and considered the submissions by the Faulkbourne Estate, including alternative construction access points and compound locations which are not considered to meet Highways Health & Safety Regulations, and proposals for an alternative haul road. Whilst noting the concerns, the Applicant has to make its own design decisions to be efficient and cannot develop a scheme that responds to all individual preferences, and must consider a balance between other interests. Decision making has to balance land take against other factors, such as Highway safety, which must take primacy, but would comprise the minimum required to deliver the project. The Applicant acknowledges the AP's concerns regarding loss of residential amenity arising from the Project, with concerns that properties owned by the Estate may become unlettable due to the proximity of the haul road. The Residential amenity has been assessed through the Environmental Statement, including consideration of visual amenity, noise, dust, traffic, health and wellbeing and other relevant environmental effects. The Applicant's assessments have been undertaken in accordance with recognised assessment methodologies and identify appropriate mitigation measures where required. Residential amenity comprises a range of factors including visual, noise and other sensory effects, all of which have been considered through the relevant Environmental Statement chapters. The Applicant considers that the Project's effects on residential amenity have been appropriately assessed and that the mitigation secured through the Development Consent Order, including the

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failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: • Residential impact: properties becoming unlettable due to proximity to haul roads • Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access • Community disruption: interference with footpaths, local routes, and daily activities • Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment • Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings¹²³ For instance, placing a haul road through the centre of a large field would prevent the use of standard 38m machinery and require a complete redesign of drainage systems.	Outline Code of Construction Practice, will minimise impacts so far as reasonably practicable. The Applicant considers that the temporary and occasional use of access rights for construction, maintenance and operational purposes would not give rise to unacceptable effects on residential amenity and that the rights sought are proportionate to the requirements of the Proposed Development. The Applicant remains committed to ongoing engagement regarding alternative access arrangements and mitigation measures where these are practicable and consistent with the safe delivery and operation of the Project. Notwithstanding, the Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including loss of rental income) assessed on a case-by-case basis. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan [Revision F] and 7.2 Outline Code of Construction Practice [Revision F] contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

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Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: • The consultation process fell short of statutory requirements • There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts • Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: • The Secretary of State cannot be satisfied that all relevant considerations have been taken into account • The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests:	Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a

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• Negotiations have been ongoing for several years without resolution • Landowners have not been provided with final or clear terms • NG will not engage with landowners suggestions of even minor changes/ameliorations • The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: • Compulsory acquisition powers are being used prematurely • The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: • Insufficient detail on infrastructure such as bridges across flood-prone areas • Construction proposals that are impractical or unsafe • Lack of clarity on how temporary works would be implemented and restored	consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

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Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) • Land and rights are broader than required • Alternatives exist that would reduce land-take • The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) • Impacts on landowners are severe and disproportionate • Consultation and alternatives analysis are inadequate • Negotiation efforts have been insufficient • The balance between public benefit and private harm is not properly justified 9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008.	Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision

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The evidence indicates that: • The extent of compulsory acquisition is not fully justified • Less intrusive alternatives have not been adequately considered • The impacts on affected landowners and communities are excessive • Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: • Demonstrate genuine optimisation of the route and access arrangements • Provide clear evidence of alternatives being properly assessed • Engage meaningfully with affected parties • Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why

Please summarise (in no more than 1500 words) the reason(s) for your objection

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offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

154. AP 154 - Aura Power Development Ltd

154.1 Person with Interest in Land (PIL) Reference ID: 10316

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Aura Power objects to the inclusion of its land interests and the proposed interference in its land rights within the forthcoming Development Consent Order (DCO) application. National Grid cannot satisfy the strict statutory conditions as set out within Section 122 and 123 of the Planning Act 2008, nor the requirements of the Department for Communities and Local Government Guidance 'Planning Act 2008: Guidance related procedures for compulsory acquisition'. The Specific objections regarding the differing types of rights to be acquired by National Grid are detailed below: 1. Compulsory Acquisition of Land (Permanent Pylon RG91): Aura Power objects to the compulsory acquisition of land for permanent pylon RG91 under Section 123 of the Planning Act 2008. The Applicant fails to satisfy Section 122(3) of the Act and Paragraph 13 of the Guidance, which dictate that a DCO may only authorise compulsory acquisition if there is a compelling case in the public interest, which outweighs the private	Summary of Objection The Applicant understands that Aura Power Development Ltd objects in its capacity as the holder of a consented solar development (Haedus Solar Farm, planning reference DC/23/05426 under Mid Suffolk District Council). The objection raises the following concerns: that pylon RG091 is positioned within the footprint of the consented solar farm and conflicts with the solar development; that the proposed permanent access rights would cross the underground cable route in five locations, creating operational conflicts; that the overhead line between pylons RG090 and RG092 would pose operational risks for the solar development once it becomes operational; and that the use of a temporary haul road and area of temporary possession during construction would have an adverse impact on both the visual landscaping strategy and the biodiversity net gain obligations secured under the planning permission for the solar development. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN. Consolidated Response The Applicant's land agent, Fisher German (Jake Toddington), issued version 1 of the Heads of Terms to the AP in October 2025 and version 2 was issued in April 2026. A site

Please summarise (in no more than 1500 words) the reason(s) for your objection

loss suffered. Permanent pylon RG91 would cause severe, disproportionate loss by materially disrupting Aura Power's land rights held via an option for lease (via the project SPV Haedus Solar Ltd (company no. 13663837)) and a restriction against title that it holds over the whole of title SK176181. The title is designated for a utility-scale, ground-mounted solar project which already benefits from planning consent (making it committed development) granted by Mid Suffolk District Council on 13 August 2025 (LPA ref. DC/23/05426). The interference in Aura Power's land rights will directly prevent Aura Power from fulfilling its statutory Biodiversity Net Gain (BNG) obligations under its planning consent and its legal obligations relating to provision of skylark plots required under the Section 106 Agreement with Mid Suffolk District Council dated 8 August 2025, and therefore by extension negatively impact overall delivery of the aforementioned consented solar project. By limiting the delivery of a committed, consented renewable energy project, National Grid's proposal creates an irreconcilable conflict between two public interests.

Because this DCO application is still in preparation, National Grid has a clear duty under Paragraph 8 of the Guidance to demonstrate that "all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been

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meeting has not yet been held with this AP specifically, but the Applicant's agent attended a meeting with Norfolk-based agents, including those representing the AP, on 19 June 2026. A meeting with the AP has been arranged and is scheduled for 29 July 2026. The Applicant looks forward to that meeting and to discussing the AP's specific concerns in detail at that time.

In relation to the position of pylon RG091 within the solar development site, the Applicant confirms that the pylon has been positioned in the north-eastern corner of the proposed solar site in order to minimise the impact on the solar panel array area as far as reasonably practicable (outside of the proposed panel area). The range of movement available for this pylon is constrained by the overall alignment of the route and by the need to avoid other significant receptors. In relation to the permanent access rights, the Applicant acknowledges that the exercise of those rights would cross the underground cable route at several points (but no works are required to facilitate such permanent access route). The Applicant confirms that permanent access rights would be exercised infrequently, for the purposes of inspection and maintenance only, and the most appropriate route of access — including any agreed crossing points — would be determined in agreement with the AP at the time the rights are exercised.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary

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explored." National Grid must relocate pylon RG91 to avoid sterilising this committed green energy asset. Failure to modify the scheme means National Grid cannot demonstrate that the land taken is "no more than is reasonably required" under Paragraph 11 of the Guidance, invalidating their case under Section 122(2). 2. Compulsory Acquisition of Rights (Permanent Access to Pylons RG89, RG90 and RG91): Aura Power objects to the compulsory acquisition of permanent rights of access across titles SK176181, SK113952, and SK129903. These access rights permanently conflict with Aura Power's option for lease and cable easement rights for its consented solar development and associated cable route. These permanent rights of access propose to cross Aura Power's consented cable route in at least five locations and will therefore negatively impact Aura Power's land rights to lay a section of underground cable of approx 850 metres that forms part of the essential connection between the solar project and the point of grid connection at Diss BSP, in line with the planning consent granted by South Norfolk District Council on 7 April 2025 (LPA ref. 2023/3574). Severing or restricting the grid connection infrastructure of an independent renewable energy asset means National Grid cannot	negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected

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justify these rights as "necessary and proportionate" under Paragraph 8 of the Guidance. National Grid has failed to prove that alternative access routes have been fully explored to mitigate this impact, meaning the statutory threshold under Section 122(3) has not been met.

3. Compulsory Acquisition of Rights (Overhead Line Stringing between Pylons RG90, RG91, and RG92): The proposed location for the stringing of the new overhead line between pylons RG90, RG91, and RG92 would introduce unquantified operational risks to Aura Power's committed development. If National Grid requires operational safety buffers underneath the line, it will force an alteration of the aforementioned consented solar project's layout causing a direct loss of solar panels, clean generation output, and revenue for the solar project. Under Paragraph 9 of the Guidance, a DCO applicant must have a "clear idea of how they intend to use the land which it is proposed to acquire." By leaving potential buffer zone restrictions unconfirmed during the pre-application phase, National Grid is seeking disproportionate powers without a legitimate, fully defined purpose. This fails the test of proportionality and necessity set out in Paragraph 8 of the Guidance and Section 122(2) of the Act.

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persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

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4. Temporary Possession (Haul Road & Construction SuDS for Pylons RG89-RG92): While temporary possession is distinct from permanent acquisition, the draft DCO provision must still satisfy the overarching test of justification, minimisation of impact and proportionality by Paragraph 8 of the Guidance. Temporary possession of land outlined for the Haul Road to reach pylons RG89, RG90, RG91, and RG92 and its associated Construction SuDS would have a material impact on Aura Power's enjoyment of its land rights that exist via an option for lease (via the project SPV Haedus Solar Ltd (company no 13663837)) and restriction against title that it holds over the whole of title SK176181 for the development of a utility scale ground mounted solar project. The interference in Aura Power's land rights will negatively impact its ability to meet its BNG obligations under its planning consent granted by Mid Suffolk District Council on 13 August 2025 (LPA ref. DC/23/05426), negatively impact its legal obligations relating to provision of skylark plots required under the Section 106 Agreement with Mid Suffolk District Council dated 8 August 2025, and negatively impact the visual landscaping that Aura Power hold land rights to implement by virtue of the Haul Road route also crossing through a proposed new hedgerow and new 10m deep treebelt.	the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Therefore the interference in land rights held will impact overall delivery of the aforementioned consented solar project that is already committed development. Forcing temporary possession over this specific alignment creates an immediate compliance breach for an extant planning permission. National Grid has failed to justify why alternative, less damaging haulage routes cannot be utilised, failing the requirements of Paragraph 8 and Section 122(2).	(Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development

Please summarise (in no more than 1500 words) the reason(s) for your objection

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Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

155. AP 155 - Claire Monica Oxley Fisher (The Faulkbourne Estate)

155.1 Person with Interest in Land (PIL) Reference ID: 6234

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: • There must be a compelling case in the public interest for compulsory acquisition. • The land or rights sought must be necessary for the development. • The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner	Summary of Objection The Applicant understands that Jeremy James Fisher's objection takes the form of a detailed professional report concerning the impact of the Project on the Faulkbourne Estate. The objection raises the following principal concerns: that eleven new pylons (TB097–TB113) are proposed on the Estate, in addition to six existing pylons, and that the cumulative impact on the Estate is disproportionate; that the associated haul roads and temporary construction works are unnecessarily intrusive and that alternative, less impactful haul road alignments have not been properly considered; that the rights sought are wider than necessary, particularly in relation to the extent of permanent purchase areas; that the Applicant's approach to biodiversity net gain ("BNG") land is opaque and the extent of land sought for that purpose is not clearly explained or justified; that the pre-application consultation process was inadequate; and that the powers of compulsory acquisition are sought prematurely, before voluntary negotiations have been adequately explored. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire both permanent rights (comprising Class 1 – permanent acquisition of land, Class 2 – overhead line infrastructure, Class 3 – underground cable infrastructure, Class 4 – overhead line and underground cable infrastructure, and Class 5 – access) and powers of temporary possession (Class 7). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. For example, the Faulkbourne Estate alone would be affected by 11 new pylons (TB97–TB113) together with significant haul roads and construction activity, in addition to the 6 from the Pelham to Rayleigh line that already cross the Estate under an Easement. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: • Severe disruption to farming operations • Safety risks arising from construction routes • Loss of residential amenity • Interference with existing infrastructure and utilities	fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response The Applicant does not agree with the comment that there has been a failure to negotiate without resolution. The Applicant's land agent, Fisher German (Matthew Johnson), issued the most recent version of the Heads of Terms in April 2026. Meetings with the AP's representative, Jeremy Fisher, have most recently been held on 2 June 2026 and most recently on 1 July 2026. Those meetings have addressed helped to address the AP's design amendment requests, including proposed amendments to haul road alignments, the routing of the overhead line, and the extent of permanent purchase areas. Requests are being actively reviewed by the design and engineering teams. The Applicant's position is that if suitable amendments can be implemented to address the AP's principal concerns, the AP is likely to agree to sign the Heads of Terms. At the most recent meeting, the Applicant advised Jeremy Fisher and his agent that a revised V3 Heads of Terms will be distributed shortly with a number of amendments to provide comfort where necessary. The Applicant will continue to engage meaningfully with the AP and their agent to continue negotiations and to explore options to optimise the route and access arrangements where possible. In relation to the AP's specific concerns about disruption to farming operations, it is not disputed that, during construction of the Project, there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant has met with the landowner and their newly appointed agent on 2 June 2026 and 1 July 2026 on site. The Applicant anticipates reviewing the Estate's proposed crossing points once received and will endeavour to mitigate impacts on farming operations during construction. During construction, mitigation measures such as crossing points, suitable

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- Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: - National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. - Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, - haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and - the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and	fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery, will be created to enable farming operations to continue. Where there may be potential to interrupt farming operations we would request specific concerns to be identified. The Limits of Deviation allow for localised adjustments to for example achieve separation from boundaries at a distance to allow machinery passage without folding. On the subject of farming, the AP raises concerns about the Project placing a haul road through the centre of a large field which might prevent the use of standard 38m machinery and require a complete redesign of drainage systems. In response, the Applicant is considering whether some adjustments to pylon positions around TB105 (within the LOD) can facilitate both movement of pylons to boundaries and avoid / reduce the effects arising from the access roads. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis. Prior to construction the Applicant will seek to undertake GPR surveys and request maps of utilities in order to better inform construction practices and minimise interference with existing infrastructure and utilities. In the case of the Faulkbourne Estate, the Applicant has already received the drainage field plans from the Estate and is awaiting the drainage plans to help inform design. The Applicant will continue with regular dialogue to ensure as much information on the existing infrastructure is obtained from the Estate. Detailed design work is ongoing but will meet relevant safety standards. In the case of the practical deliverability of installing a construction route over a Ford, this will be discussed with the Environment Agency and subsequently with the landowner to confirm any specific requirements regarding dates. The design is a matter that would be discussed with the contractors. In relation to the point about permanent disruption of agricultural land where temporary access could achieve the same objective, the Applicant is unclear what the AP refers to in this instance. There is only one area within the Faulkbourne Estate which is subject to permanent freehold acquisition (the CSE) and this acquisition is strictly limited to what is necessary for the development. Whilst, some accesses are a permanent right of access for occasional inspections, the Applicant has discussed specific amendments to these in discussion with the AP.

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BNG. The Estate has offered to provide and manage BNG arising from the Scheme through carefully located sites across the Holding, at prevailing BNG Credit values, although equally National Grid could consider the UK BNG Bank. The need to compulsorily acquire land for this purpose has not been established. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: • Permanent disruption of agricultural land where temporary access could achieve the same objective • Overly wide or intrusive haul roads • Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level	In relation to the AP's comment about overly wide or intrusive haul roads, the design arrangement is to utilise haul roads to reduce the number of HGVs on narrow rural lanes, and utilise the wider road network. As such they are designed for two way HGV movement. The use of an approx. 8m wide road offers the most efficient design for traffic movement and requires adjacent land for the temporary storage of cleared topsoil and drainage attenuation arrangements. Where possible and without adding additional road distance we have responded to requests to seek to use existing tracks or follow boundaries though this is not always possible. At the Faulkbourne Estate, the Applicant has made some modifications in response to feedback, but some requests are not possible. They may be judged to add too much additional length, originate at an unsafe access point or not support crossover road crossings. Our contractors continue to look for efficiencies and in some locations may be able to reduce the road to the equivalent of single track with passing places. In relation to the AP's specific concerns about BNG land, the Applicant can confirm we are not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). Habitat creation and enhancement will be delivered within Environmental Areas, which are multi-functional areas within the Order Limits, where standard and embedded mitigation (such as landscape and visual mitigation) will be delivered alongside biodiversity gains. Any BNG deficit determined following detailed design will be delivered offsite through registered BNG providers, which could include the Faulkbourne Estate. The Applicant is open to continuing discussions over potential offsite BNG opportunities. In relation to the AP's concerns about the specific design features of the Project in this location, the Applicant confirms that the extent of land at the Fairstead cable sealing end ("CSE") compound has been reduced from earlier iterations. Haul road alignments in this location have previously been amended in response to feedback from the Estate. Further adjustments to pylon positioning are under active consideration. The Applicant acknowledges, however, that certain elements of the scheme are essential to the delivery of the Project in this location and cannot be moved or further reduced. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in [APP-358 to APP-360]).

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While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: • The scheme imposes significant and concentrated burdens on specific landowners and communities • These burdens are not adequately mitigated or justified by the chosen route • The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: • A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors • Use of existing redundant pylon routes instead of constructing entirely new infrastructure	The Applicant does not agree with the comment that there is a lack of necessity for specific land interests. The Applicant has completed its design development which has resulted in a more compact design for the CSE to one end of the field (mentioned above). Often small, awkward corners are left resulting in the normal practice of acquiring the whole field. The corners then being used to provide space for screen planting and potentially BNG. In light of the design outcome and following discussion with the Estate, the areas we would expect to retain are sufficient for soil storage and to establish screen planting, but be able to return between 3 to 4 Hectares to agricultural cropping. A similar reduction in retained land may be possible in the field to the south of the CSE subject to confirming the extent to which landscape planting is required. The Applicant acknowledges that the AP has put forward detailed responses as part of both the 2024 and 2025 consultations. The Applicant does not agree with the comment that the Applicant has not sufficiently engaged with or incorporated the alternatives proposed. The Applicant has reviewed and considered the submissions by the Faulkbourne Estate, including alternative construction access points and compound locations which are not considered to meet Highways Health & Safety Regulations, and proposals for an alternative haul road. Whilst noting the concerns, the Applicant has to make its own design decisions to be efficient and cannot develop a scheme that responds to all individual preferences, and must consider a balance between other interests. Decision making has to balance land take against other factors, such as Highway safety, which must take primacy, but would comprise the minimum required to deliver the project. The Applicant acknowledges the AP's concerns about regarding loss of residential amenity arising from the Project, with concerns that properties owned by the Estate may become unlettable due to the proximity of the haul road. The Residential amenity has been assessed through the Environmental Statement, including consideration of visual amenity, noise, dust, traffic, health and wellbeing and other relevant environmental effects. The Applicant's assessments have been undertaken in accordance with recognised assessment methodologies and identify appropriate mitigation measures where required. Residential amenity comprises a range of factors including visual, noise and other sensory effects, all of which have been considered through the relevant Environmental Statement chapters. The Applicant considers that the Project's effects on residential amenity have been appropriately assessed and that the mitigation secured through the Development Consent Order,

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- Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier consultations (2024–2025), it appears that National Grid has not sufficiently engaged with or incorporated these alternatives. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: - Residential impact: properties becoming unlettable due to proximity to haul roads - Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access - Community disruption: interference with footpaths, local routes, and daily activities - Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment - Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing	including the Outline Code of Construction Practice, will minimise impacts so far as reasonably practicable. The Applicant considers that the temporary and occasional use of access rights for construction, maintenance and operational purposes would not give rise to unacceptable effects on residential amenity and that the rights sought are proportionate to the requirements of the Proposed Development. The Applicant remains committed to ongoing engagement regarding alternative access arrangements and mitigation measures where these are practicable and consistent with the safe delivery and operation of the Project. Notwithstanding, the Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including loss of rental income) assessed on a case-by-case basis. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have Informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan [Revision F] and 7.2 Outline Code of Construction Practice [Revision F] contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
farming operations to continue on the land holdings For instance, placing a haul road through the centre of a large field would prevent the use of standard 38m machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: • The consultation process fell short of statutory requirements • There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts • Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: • The Secretary of State cannot be satisfied that all relevant considerations have been taken into account	Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: • Negotiations have been ongoing for several years without resolution • Landowners have not been provided with final or clear terms • NG will not engage with landowners suggestions of even minor changes/ameliorations • The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: • Compulsory acquisition powers are being used prematurely • The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical	The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
deliverability of the scheme as designed, including: • Insufficient detail on infrastructure such as bridges across flood-prone areas • Construction proposals that are impractical or unsafe • Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity) • Land and rights are broader than required • Alternatives exist that would reduce land-take • The scheme has not been optimised to minimise interference Section 123 (Compelling Case in the Public Interest) • Impacts on landowners are severe and disproportionate • Consultation and alternatives analysis are inadequate • Negotiation efforts have been insufficient	Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
- The balance between public benefit and private harm is not properly justified 9. Conclusion In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008. The evidence indicates that: - The extent of compulsory acquisition is not fully justified - Less intrusive alternatives have not been adequately considered - The impacts on affected landowners and communities are excessive - Procedural shortcomings undermine confidence in the scheme Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met. To proceed lawfully, National Grid need to: - Demonstrate genuine optimisation of the route and access arrangements - Provide clear evidence of alternatives being properly assessed - Engage meaningfully with affected parties	authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• Ensure that land acquisition is strictly limited to what is necessary Absent such steps, the justification for compulsory powers remains open to significant challenge.	offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP122, 2024 in APP-359 and 2023 in APP-358]. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

156. AP 156 - Stacey Farms Ltd

156.1 Person with Interest in Land (PIL) Reference ID: 10402

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Lack of financial compensation	Summary of Objection The Applicant understands that Stacey Farms Ltd's objection is principally concerned with the adequacy of the financial compensation to be offered for the impact of the Project on the farming operations, and that the AP seeks greater clarity and certainty on this point before it would be in a position to consider agreeing the Heads of Terms. Land Rights Sought The Applicant understands that the AP holds freehold and occupation interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Consolidated Response The Applicant's land agent, Fisher German, held a meeting on 12 May 2026 with the AP, the design team, and a UKPN representative, at which the route design and its impact on farming operations was discussed in detail. Justification for the routing and siting decisions in this location was provided at that meeting. A specific concern raised by the AP relates to the impact of the Project on an existing horse paddock, the loss of which would require the AP to relocate the paddock and incur associated costs. The Applicant has assessed the impact on the horse paddock and adjustments have been made to the haul road alignment and pylon positioning to reduce the encroachment on the paddock. The Applicant is awaiting the AP's agents, Whirledge & Nott, to provide evidence-based valuations in respect

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of the cost of relocating the paddocks so that the Applicant can review and respond appropriately. No response has been received from the agent to date, but once the evidence has been provided the Applicant will review it. The pylon and route alignment in this location are consistent with the Holford Rules.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

157. AP 157 - Carol Gosling

157.1 Person with Interest in Land (PIL) Reference ID: 4794

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property	Summary of Objection The Applicant understands that Carol Gosling's objection raises the same concerns as those set out by Dennis Gosling (AP158): that land has been included in the Order Limits for convenience rather than necessity; that the powers of compulsory acquisition are not justified; that the rights sought are disproportionate; that alternatives have not been properly considered; that the Heads of Terms are not acceptable and that site-specific negotiations have been insufficient; and that the pre-application and examination consultation has been inadequate, with reference to the Lord Banner KC legal opinion and ESNP group concerns. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Consolidated Response The Applicant's land agent, Fisher German, met with the AP directly on 26 February 2026 to discuss the Heads of Terms. A further meeting took place on 20 April 2026 between Fisher German and the AP's agents to negotiate version 2 of the Heads of Terms, with a National Grid representative in attendance. In relation to the AP's concerns about agricultural land and soil impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
rights therefore goes further than is reasonably required. National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination. The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and	the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold

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archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with

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Applicant's Response

subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

158. AP 158 - Dennis Gosling

158.1 Person with Interest in Land (PIL) Reference ID: 7327

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property	Summary of Objection The Applicant understands that Dennis Gosling's objection raises the same concerns as those set out by Carol Gosling (AP157): that land has been included in the Order Limits for convenience rather than necessity; that the powers of compulsory acquisition are not justified; that the rights sought are disproportionate; that alternatives have not been properly considered; that the Heads of Terms are not acceptable and that site-specific negotiations have been insufficient; and that the pre-application and examination consultation has been inadequate, with reference to the Lord Banner KC legal opinion and ESNP group concerns. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, and easement right or privilege interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Consolidated Response The Applicant's land agent, Fisher German met with the AP directly on 26 February 2026 to discuss the Heads of Terms, and a further meeting took place on 20 April 2026 between Fisher German and the AP's agents to negotiate version 2 of the Heads of Terms, with a National Grid representative in attendance. In relation to the AP's concerns about agricultural land and soil impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at

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rights therefore goes further than is reasonably required.

National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted.

There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments

have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination.

The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and

Applicant's Response

the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [**Revision B**]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [**Revision B**]).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [**Revision B**]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [**Revision D**] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [**REP3-010**] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [**REP1-138**]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold

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Applicant's Response

financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the

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Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

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Applicant's Response

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

159. AP 159 - Alexander David Robert Micklem

159.1 Person with Interest in Land (PIL) Reference ID: 6898

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights	Summary of Objection The Applicant understands that Alexander David Robert Micklem's objection raises the same principal concerns as those of the Goslings (AP157 and AP158): that land has been included in the Order Limits for convenience rather than necessity; that the CA powers are not justified; that the rights sought are disproportionate; that alternatives have not been properly considered; that the Heads of Terms are not acceptable and that site-specific negotiations have been insufficient; and that the pre-application and examination consultation has been inadequate, with reference again to the Lord Banner KC legal opinion and ESNP group concerns. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, easement right or privilege, and restrictive covenant interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. Consolidated Response The Applicant's land agent, Fisher German, has engaged extensively with this AP across multiple meetings. An initial Heads of Terms meeting took place on 24 February 2026, at which accommodation works were discussed in detail including proposed crossing points,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

therefore goes further than is reasonably required.

National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted. There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made. National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO application to proceed to examination.

The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and archaeology, soils and the environment. If

haul road alignments, permanent access routes, and tower locations. A further meeting was held on 30 April 2026 at which detailed design matters were discussed, including matters relating to land ownership changes that had come to light. A Microsoft Teams meeting was subsequently held to discuss pylon design options, including the choice between short and tall pylons and specific positioning. A site meeting was held on 1 June 2026 at which tower heights and locations and the scope of proposed intrusive surveys were discussed. A further meeting is proposed. The Applicant's view is that if the amendments under discussion can be implemented to the AP's satisfaction, the AP may be willing to sign the Heads of Terms.

In relation to the AP's concerns about agricultural land and soil impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion

of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

[REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report [APP-066]

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

160. AP 160 - Charles Nicholas Micklem

160.1 Person with Interest in Land (PIL) Reference ID: 14503

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the compulsory acquisition powers sought by National Grid on the basis that it has not demonstrated that the rights sought over my land are necessary, proportionate, or that reasonable alternatives have been properly considered. Land has been included for convenience, future flexibility or wider working areas, rather than because it is essential. This would have a significant impact on the farm business, including disruption to agricultural operations, access, cropping, drainage, irrigation and the general management of the holding. The extent of the rights sought also appears disproportionate. In some cases, National Grid are seeking permanent rights or extensive rights over land where temporary access or more limited rights may be sufficient. The proposed pylons, access tracks, compounds and working areas have not been designed in a way that minimises the impact on the landowner or the retained holding. The interference with private property rights	Summary of Objection The Applicant understands that Charles Nicholas Micklem's objection raises the same principal concerns as those of Alexander David Robert Micklem (AP159) and the Goslings (AP157 and AP158): that land has been included in the Order Limits for convenience rather than necessity; that the CA powers are not justified; that the rights sought are disproportionate; that alternatives have not been properly considered; that the Heads of Terms are not acceptable and that site-specific negotiations have been insufficient; and that the pre-application and examination consultation has been inadequate, with reference to the Lord Banner KC legal opinion and ESNP group concerns. The AP has also raised concerns over planned geotechnical borehole surveys that are planned to take place on their holding. Land Rights Sought The Applicant understands that the AP holds freehold, occupation, easement right or privilege, and restrictive covenant interests within the Project Order Limits. For National Grid, the Applicant is seeking to acquire permanent rights comprising Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). For UKPN, the Applicant is seeking to acquire permanent rights comprising Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid. Certain parcels of land in which the AP holds an interest fall within Class 8, where no powers of compulsory acquisition or temporary possession are sought. The Applicant sets out below the position regarding the engagement that has taken place and responses applicable to this AP's objection.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

therefore goes further than is reasonably required.

National Grid has not properly considered alternatives. Where alternative access routes, compound locations, pylon positions or design changes have been suggested, these do not appear to have been properly explored or adequately responded to. National Grid should be required to demonstrate why less intrusive alternatives cannot be adopted.

There has also been insufficient meaningful negotiation on site-specific impacts. The generic Heads of Terms are not in an acceptable format and site specific commitments have not yet been made.

National Grid has not taken sufficient steps to acquire the necessary rights by agreement before relying on compulsory acquisition powers. I also remain concerned about the adequacy of the consultation process. The legal opinion of Lord Charles Banner KC, submitted by the Essex Suffolk Norfolk campaign group, identifies a number of alleged legal deficiencies in National Grid's consultation approach and argues that the consultation falls short of what is required to enable the DCO

application to proceed to examination.

The ESNP group has also referred to professional reports identifying procedural and methodological concerns in National Grid's approach to landscape, heritage and

In addition to the engagement described below, the Applicant's land agent notes the following matters relevant specifically to this AP. The Applicant has confirmed to the AP that an application for planning permission for certain enabling works is expected to be submitted under the Town and Country Planning Act 1990 ("TCPA"), as a matter separate and entirely independent from the DCO application. This TCPA enabling works application does not presuppose, assume, or in any way prejudice the grant of development consent under the DCO. The application is at a pre-application stage and does not confer any right or entitlement on the Applicant to carry out the relevant works. Following the third Compulsory Acquisition Hearing ("CAH3"), the Applicant spoke with the AP and agreed to meet on site on 9 July 2026 to discuss the AP's concerns directly. The Applicant also confirms that the borehole works proposed in this location are for geotechnical analysis purposes only, specifically to obtain ground investigation data relevant to the engineering design of the Project. The Applicant is reviewing the position on the boreholes and will issue a position statement to address any concerns accordingly.

Consolidated Response

The Applicant's land agent, Fisher German, has engaged extensively with this AP and the family's interests across multiple meetings. An initial Heads of Terms meeting took place on 24 February 2026, at which accommodation works were discussed in detail including proposed crossing points, haul road alignments, permanent access routes, and tower locations. A further meeting was held on 30 April 2026 at which detailed design matters were discussed, including matters relating to land ownership. A Microsoft Teams meeting was subsequently held on 7 May 2026 to discuss pylon design options, including the choice between short and tall pylons and specific positioning. A site meeting was held on 1 June 2026 at which tower heights and locations and the scope of proposed intrusive surveys were discussed. A further meeting was held with the landowner and their agent on 9 July 2026 to provide answers to a number of queries raised at the previous meeting. The landowner also raised a number of further comments that the Applicant is due to respond on. The Applicant remains committed to progressing those discussions with the AP and their agent and has made a number of site specific commitments to provide some comfort to the landowner (these were summarised in an email dated 23 June 2026 directly to the AP and their agent) and verbally at a site meeting on 9 July 2026. The Applicant is seeking to agree a voluntary agreement with the landowner and will continue to engage constructively on this basis.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
archaeology, soils and the environment. If these issues have not been properly corrected and consulted upon, they create further concerns regarding the adequacy of the application and the compulsory acquisition powers sought.	In relation to the AP's concerns about agricultural land and soil impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Compulsory Acquisition Hearing 1 **[REP1-138]** are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have raised concerns regarding the environmental impacts of the Project. The Applicant has addressed those concerns thoroughly in the Environmental Statement and associated documents submitted as part of the application. The Environmental Statement was prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assessed the likely significant effects of the Project across all relevant environmental topics, including ecology, noise and vibration, landscape and visual impact, cultural heritage, and agriculture and soils. Where significant effects have been identified, the Applicant has committed to appropriate mitigation measures, many of which are secured through the draft DCO and the Outline Code of Construction Practice (OCoCP). The Applicant is satisfied that the environmental impacts of the Project have been appropriately assessed and that adequate mitigation is in place, and it invites the Examining Authority to have regard to the Environmental Statement and associated documents when considering the objections of the AP in relation to environmental matters.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

161. AP 161 - Personal Representative to the Estate of Frederick Hamilton

161.1 Person with Interest in Land (PIL) Reference ID: 25512

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Current, slightly ambiguously worded, announcements suggest the the project may CA land for use after the construction of the pylon route is completed. While we appreciate that easement access for maintenance to the pylons is required, acquisition of land will severely impact the usefulness of the surrounding fields. Furthermore, it is unclear why such acquisition is justifiable unless the National Grid etc. are planning on farming ?	Summary of Objection The AP has summarised their reasons for objection as follows: Announcements suggest potential compulsory acquisition of land for post-construction use of the pylon route; while maintenance easements are understandable, full acquisition would significantly reduce the agricultural value of surrounding fields and appears unjustified unless the undertaker intends an ongoing land use (eg farming), which has not been clarified. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that a meeting was held with the applicants land agent Fisher German) on 21 May 2026, at which the Heads of Terms document was reviewed in full and the agent provided feedback on the terms. That feedback has been provided to National Grid as part of the updated Heads of Terms drafting. In response to the AP's concern about permanent access routes, the rights of access will be acquired by the Applicant; the land itself will not be owned by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In regards to agricultural activities, these can generally continue beneath and around operational overhead lines, temporary land will be reinstated following construction, and compensation would be payable in accordance with the Compensation Code where applicable.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

162. AP 162 - Martyn Mills

162.1 Person with Interest in Land (PIL) Reference ID: 17600

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Conformation required that the rights do not extend beyond the highway into my title.	Summary of Objection The AP's objection seeks confirmation that the rights do not extend beyond the highway into the AP's title. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). The Applicant has confirmed that these rights are no longer required and a V2 HoTs was not sent to the AP and no further negotiations are required. The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure). Consolidated Response Discussions remain ongoing with third party organisations (UKPN) who have also been introduced into the conversation. A meeting was held with the APs and UKPNs representatives on 11th June 2026 and the Applicant awaits formal feedback from the relevant organisations that can be shared with the affected persons. In relation to the AP's specific concern about the extent of rights relative to the highway boundary, the Applicant can confirm that it has no plan to access the AP's private land in this location. The affected plots relate to a section of public highway which the Applicant is seeking temporary rights over to install cables. The Applicant is aware of a discrepancy between the Land Registry title plan, the Ordnance Survey mapping and the adopted highway boundary. It appears that the AP may have inadvertently become an affected person in relation to certain plots as a result of this discrepancy. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

163. AP 163 - Hugh Hamilton

163.1 Person with Interest in Land (PIL) Reference ID: 15833

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
It is unclear why the N-T operator will, upon completion of the project, have need to compulsorily acquire portions of land in order to provide maintenance and upkeep of the line instead of the usual permissive easements which are typically used. Loss of agricultural land will impact the ongoing access, usage & profitability of the surrounding land.	Summary of Objection The AP objects that the Norwich–Tilbury operator appears to be proposing compulsory acquisition of land for post-construction maintenance rather than using standard permissive easements, resulting in loss of agricultural land and adverse impacts on access, use and profitability of surrounding holdings. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response Permanent rights are required to construct, operate, inspect, maintain, repair, replace and access the transmission infrastructure throughout its operational life. The Applicant is generally seeking rights rather than outright acquisition and has sought to minimise land requirements where reasonably practicable. Agricultural activities can generally continue beneath and around operational overhead lines, temporary land will be reinstated following construction, and compensation would be payable in accordance with the Compensation Code where applicable. A meeting was held with the AP's land agent, Fisher German, on 21 May 2026, at which the Heads of Terms document was reviewed in full. The agent made comments on all of the terms, and that feedback has been provided to National Grid as part of the updated Heads of Terms drafting. In response to the AP's concern about permanent

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

access routes, the rights of access will be acquired; the land will not be owned by the Applicant.

In relation to the AP's concern about the impact on agricultural land, during the construction and operation of the Project, the Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

The Applicant notes concerns raised by certain APs regarding the nature of permanent access rights sought by the Applicant. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

164. AP 164 - Paul Edmund Baker

164.1 Person with Interest in Land (PIL) Reference ID: 3085, 14920, 5262

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Insufficient consultation. Land originally not impacted then route change (Suffolk 3 Change) occurred with no further consultation in regards to new land impacts created by change. The Rights to be acquired re 9/53 9/56 9/102 9/99 are way beyond what could be achieved with alternatives that we have been unable to discuss that would have lower cost and impact for all parties	Summary of Objection The AP's objection concerns insufficient consultation. The AP submits that the land was originally not impacted by the scheme and a route change (the Suffolk 3 Change) subsequently occurred with no further consultation in respect of the new land impacts created by that change. The AP further submits that the rights to be acquired in respect of plots 9/53, 9/56, 9/102 and 9/99 are beyond what could be achieved with alternatives that the AP has been unable to discuss, which would have lower cost and impact for all parties. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds a subsoil interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant is in regular discussions with the APs representative, with the latest meeting being held on 26 May 2026 to review and discuss the grantor land plans. Information regarding accommodation works has also been provided to the APs representative. The APs representative has also attended the Land Agent group meeting held on 4 June 2026 to continue discussions on the HOTs.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant does not agree that consultation in respect of the Suffolk 3 Change was insufficient. The Suffolk 3 Change was subject to a targeted consultation process and consultation materials were issued to those identified within the consultation zone. The Applicant's Consultation Report describes the targeted consultation undertaken in Norfolk, Suffolk, Essex and Thurrock and the approach adopted to engage with affected persons. The Applicant considers that the consultation undertaken was appropriate and proportionate to the nature of the proposed change.

The Applicant notes the Affected Person's concern that the Suffolk 3 Change introduced new impacts on their land. The purpose of the targeted consultation was to provide an opportunity for interested parties to review and comment on the proposed changes, and all feedback received was considered as part of the development of the Project. The Applicant further notes that amendments to a proposed application do not necessarily require further consultation unless they materially and substantially change the proposed application or its effects as a whole. In relation to plots 9/53, 9/56, 9/99 and 9/102, the Applicant considers that the rights sought are necessary and proportionate to facilitate the construction, operation, maintenance and access requirements of the Project. The extent of the rights sought has been developed through the design process and reflects the land and rights reasonably required to deliver the Project. The Applicant remains willing to engage with the Affected Person regarding potential alternatives and site-specific concerns where these can be accommodated without compromising the safe and efficient delivery of the Project. The Applicant will continue to engage with the Affected Person and their representatives throughout the Examination and, if the Order is made, during the detailed implementation phase of the Project. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion. oThe Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. oThe Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

165. AP 165 - Radnoel Ltd

165.1 Person with Interest in Land (PIL) Reference ID: 17432

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
how's this? Objection to Compulsory Acquisition / Interference with Land Rights (EN020027) I object to the proposed compulsory acquisition of my freehold land in connection with EN020027, as a Category 1 and/or Category 2 Affected Person under section 57 of the Planning Act 2008. Compelling case not established (Section 122(3)) The Applicant has failed to demonstrate a compelling case in the public interest as required by Section 122(3). There is no adequate justification that my specific land is essential to the scheme, nor that the public benefits clearly outweigh the private harm caused to me as a freehold owner. Lack of necessity and unjustified routing (Section 122(2)) Section 122(2) requires that land is no more than reasonably necessary to deliver the development. The routing appears to have been selected in a way that directly affects my freehold despite the apparent availability	Summary of Objection The AP's objection raises a number of grounds: • first, that the Applicant has failed to establish a compelling case in the public interest as required by Section 122(3), with no adequate justification that the AP's specific land is essential to the scheme; • second, that the routing was selected in a manner that directly affects the AP's freehold despite the apparent availability of viable alternative alignments; • third, that there has been a failure to engage and negotiate meaningfully, with engagement limited to generic communications and no one-to-one negotiation; • fourth, that the proposed acquisition represents a disproportionate interference with the AP's property rights, including under human rights principles. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure) and (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for BT Openreach over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
of viable alternative alignments that would avoid my land entirely. My land does not represent the most logical or least intrusive option. The Applicant has not demonstrated that alternatives have been properly assessed or that the extent of land take represents the minimum required. Failure to engage and negotiate (DCLG Guidance, paras 8–10, 25–27) The DCLG Guidance requires meaningful efforts to acquire land by agreement and to engage directly with affected persons. To date, engagement has been limited to generic communications, with no meaningful one-to-one negotiation, no attempt to agree terms, and no exploration of how impacts on my land might be avoided or reduced. This falls short of the Guidance requirements. Disproportionate interference (Guidance and human rights principles) The proposed acquisition represents a disproportionate interference with my property rights. Given that alternative routes appear available, the decision to acquire my freehold is not justified. The Applicant has not demonstrated that a less intrusive solution would be incapable of delivering the scheme. Overbreadth of land take (Section 123) The extent of land sought from my freehold is excessive and not clearly limited to what is	A meeting was held with the AP's representative on 20 April 2026 to negotiate Heads of Terms version 2, with National Grid Electricity Transmission in attendance. This case has been managed by Fisher German who are the Applicants land agents. The APs representative has attended Land Agent Group Meetings to continue discussions on the HOTs, the latest being held on 4th June 2026. Feedback received throughout the design development stage of the Project proposed moving pylons TB257 and TB258 to the west of Buckingham Hill Road, however due to the household waste recycling site being the only location with potentially suitable ground conditions the change could not be taken forward. More localised changes were made to pylon TB258 to avoid the need to position a pylon within the main compound of an operational aggregates facility. This does move the pylon into the adjacent Maple Park (within which TB257 is also located), however the land use in the area the pylons would occupy is used for informal recreation which (given the scale of the park) would be largely unaffected by the proposals whereas leaving it unchanged would cause substantial business disruption or require a relatively high level of compensation for the effects on the business. (see further details in 5.15 Design Development Report [APP-122]). The application design has been developed in a proportionate manner (i.e. a design appropriate for the application but not a full engineering design). The LoD provide flexibility to respond to as yet unknown physical characteristics of the particular location. As a result, there are also some smaller changes requested by APs (within the LoD and the Order Limits) where there remains some scope for adjustment. Because some of these potential changes may be close to the maximum LoD, the Applicant is cautious to make such changes when there remains uncertainty about the physical characteristics and potential that the change may not be able to be implemented due to the new build nature of the Project. The actual physical characteristics that influence micro-siting will be identified by the completion of location specific intrusive investigations and detailed design undertaken by the Applicant's delivery partner. This potential for further micro-siting will be considered through the detailed design and informed by site specific discussions between the AP and the Applicant. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010]

Please summarise (in no more than 1500 words) the reason(s) for your objection

strictly necessary. No adequate explanation has been provided as to why a reduced land take, or an alternative alignment avoiding my land, would be insufficient.

Uncertainty as to deliverability (Section 122(2)(b); Guidance paras 13–17)

There is insufficient certainty that the scheme, insofar as it affects my land, is fully funded and deliverable. This further undermines the justification for granting compulsory acquisition powers.

Conclusion

The proposed acquisition does not satisfy the statutory tests in Sections 122 and 123 of the Planning Act 2008 or the requirements of the DCLG Guidance (September 2013).

The Applicant has failed to demonstrate necessity, proportionality, proper engagement, or a compelling public interest case in respect of my land. The routing unjustifiably targets my freehold where alternatives appear to exist. Accordingly, compulsory acquisition powers should not be authorised in respect of my interest.

Applicant's Response

which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have referenced alternative technical solutions for electricity transmission, in particular the use of high voltage direct current ("HVDC") technology and/or offshore routing. The Applicant's position in response to these alternatives is set out in detail in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]** and in the Applicant's Written Representation **[REP1-006]**, however the Applicant provides the following further response for the assistance of the Examining Authority. The Applicant made a considered assessment of offshore and HVDC technologies as part of its options assessment, with the results published in the 2.4 Preliminary Environmental Information Report (Chapter 3: Alternatives and Design Evolution) **[APP-058]**. The assessments concluded that offshore and HVDC technologies were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and resilience that is required for the GB Transmission network. Additionally, HVDC underground cable technology is not currently available in the lengths required by the Project and would require a converter station either end of the route. Constructing a converter station at or near Bramford Substation would be technically challenging and potentially introduce additional or greater effects on local residents than the current scheme. Given the Applicant's statutory obligation to provide cost efficient

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	transmission services whilst maintaining system security, it concluded that HVDC options did not offer a technically viable or cost-effective solution to connect the required generation capacity to the grid. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

166. AP 166 - Stephen Baker, for H&O Godbold Partnership, and Thornbush Energy Ltd

166.1 Person with Interest in Land (PIL) Reference ID: 28420, 28421, 9646,

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We DO recognise the need for this major upgrade in energy infrastructure, but we have found it necessary to formally object due to the manner in which National Grid have pursued the implementation of the DCO project on our farm. a) The process for gaining CPA/TP does not withstand scrutiny, and is flawed (see our formal objection for legal detail). In particular consultation has been lacking, and - until recently - engagement very poor. b) As yet UKPN have not agreed the land they will finally need access to, and their consultation process has started very late - too late - for CPA/TP to be effective. c) Areas of land initially included by NGET for compulsory purchase (e.g. soil bund, and extension to sub station site) have already been revised following negotiation, which begs the question, where else is no longer necessary to be compulsorily acquired?	Summary of Objection The AP's objection is made on the following grounds: the AP recognises the general need for new energy infrastructure but submits that the process adopted for compulsory acquisition and temporary possession is flawed; UKPN consultation started too late in the process; areas of land affected have been revised following negotiation but access requirements have not been finalised; there is confusion between this scheme and another DCO (Bramford to Twinstead); and the AP considers that it is unable to withdraw its objection at this stage. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 1 (acquisition of land) (b) Class 2 (overhead line infrastructure), (c) Class 3 (underground cable infrastructure), (d) Class 4 (overhead line and underground cable infrastructure), (e) Class 5 (access), (f) Class 6 (drainage). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable system) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant acknowledges the concern raised. UK Power Networks ("UKPN") is undertaking its own landowner engagement in relation to the rights required for its diversion works and continues to develop its detailed design and land requirements. The Applicant and

Please summarise (in no more than 1500 words) the reason(s) for your objection

d) Access requirements/arrangements to allow the farm to continue to function as a business have still not been finalised.

e) There is confusion between this and the other DCO (Bramford to Twinstead), with both projects claiming the need to access the same land on our farm.

Although work continues on Heads of Terms, and agreeing how the DCO can proceed effectively on Thornbush Farm, the fundamental points made in our objection about process and engagement remain entirely valid, and the lack of progress obliges us to conclude that we cannot withdraw our objection at this time.

Applicant's Response

UKPN are actively coordinating engagement activity and remain committed to pursuing voluntary agreements wherever possible. The fact that discussions remain ongoing does not remove the justification for the compulsory acquisition and temporary possession powers sought. Those powers are included to ensure that the authorised development can be delivered should voluntary agreements not be secured within the timescales required for the Project.

The Applicant keeps the extent of land and rights sought under continual review as the Project design develops. Where refinements have identified opportunities to reduce land take or rights requirements, those changes have been incorporated into the Project and reflected in the application documents as appropriate. However, the Applicant is satisfied that the land and rights currently identified in the Order are required to construct, operate and maintain the authorised development and that a compelling case exists for the powers sought. The ongoing refinement of certain elements of the design does not indicate that the remaining land and rights included within the Order Limits are unnecessary.

In relation to the AP's concern that access requirements have not been finalised, the Applicant confirms that the intent is for sufficient access to be maintained at all times to allow continued function of the farm as a business, throughout both the construction and operation of the Project.

With regard to the AP's concern about UKPN's engagement with affected persons, UK Power Networks has been engaged in discussions with affected persons and their agents throughout the process. A meeting was held with this affected person and their agent on 23 February 2026. Plans identifying UKPN's works were provided to the land agent on 31 March 2026. Discussions are ongoing to agree UKPN's requirements and to reach a voluntary grant of the necessary rights. The Applicant confirms that compulsory acquisition of rights for UKPN will only be pursued if it proves impossible to reach a voluntary agreement with the relevant affected person, and that voluntary negotiation is intended to continue beyond the examination and any granting of the DCO.

In relation to Heads of Terms, the Applicant will seek, wherever reasonably practicable, to enter into voluntary agreements with those affected by the Project. The Applicant has served Heads of Terms on affected persons where negotiations have been sufficiently advanced. Heads of Terms are, by their nature, a record of ongoing negotiations and will be subject to change as discussions continue. Where Heads of Terms have not yet been served, this will

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

be because negotiations have not been at a stage where it would be appropriate to do so. The Applicant is committed to continuing to progress Heads of Terms with all affected persons as the Project advances. In the event that a DCO is granted for the Project, the Applicant intends to continue its negotiations in good faith, and the inclusion of compulsory acquisition powers in a DCO would not preclude the Applicant from entering into a voluntary agreement with an affected person at any stage.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons -

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

167. AP 167 - Stephanie Jane Bickford

167.1 Person with Interest in Land (PIL) Reference ID: 7371

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed interference with my land rights through the acquisition of a temporary access easement over plot G-4/53, at 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG, registered title number EX681970. Under Sections 122 and 123 of the Planning Act 2008, the compulsory acquisition of rights should only be authorised where the applicant can demonstrate that the rights sought are necessary, proportionate and supported by a compelling case in the public interest. The Department for Communities and Local Government Guidance further requires a clear justification for the extent of any rights sought and that interference with private rights is no greater than is reasonably necessary. I do not consider that National Grid has adequately demonstrated that these requirements have been met. The rights sought in the application are broad and potentially permit a wide range of activities. However, during discussions, National Grid representatives have indicated	Summary of Objection The AP's objection concerns interference with land rights through the acquisition of a temporary access easement over plot G-4/53, 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG (EX681970). The AP submits that the rights sought are broad in their terms, that key information remains outstanding at this stage, and that members of the household hold protected characteristics. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold. The Applicant's DCO submission sought temporary possession powers (Class 7) for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response Following Compulsory Acquisition Hearing 2 the Applicant met with the AP on site, and subsequently confirmed in writing to the AP's land agent ahead of Compulsory Acquisition Hearing 3 that the Applicant will not seek to acquire a subsoil interest from the land fronting their land holding at 548 Rayleigh Road in relation to their title compromising part of plot G-4/53. The Applicant will continue to seek rights pursuant to the DCO, as the AP's title does not form the entirety of this plot G-4/53 but its assessment is that no physical works will take place over the AP's land holding and, accordingly, no rights will be required to be compulsorily acquired. The Applicant confirms that the AP will continue to receive notification in respect of the DCO due to the continued inclusion of plot G-4/53. This has been confirmed to the AP's land agent. It can be explained further at the September meeting if there is any confusion on this point.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the intended use may be more limited than the powers sought. Despite this, the application documents have not been amended, and there remains uncertainty as to the actual extent of rights required and how they would be exercised.

In addition, key information necessary to assess the proportionality of the interference remains outstanding. This includes details of the construction programme, duration and sequencing of works, working hours, traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures. National Grid has also indicated that potential mitigation for impacts on my household, including measures to reduce noise at source, is being considered. National Grid has been made aware that members of my household have protected characteristics which require particular consideration when assessing the impacts of the proposed rights; however, no final assessment, mitigation strategy, implementation plan or supporting documentation has been provided. In the absence of this information, it is not possible to understand how these matters have been taken into account or how they inform the assessment of proportionality.

Whilst engagement has taken place, responses have largely been generic and have not provided sufficient property-specific

A further meeting was held with the Applicant, the AP and their land agent at the AP's home on 7th July 2026 to further understand matters relating to protected characteristics and to provide an update on the construction programme, duration and sequencing of works, working hours traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures as requested. A summary of the meeting containing information on these topics was subsequently provided in writing to the AP and their agent. A further meeting is scheduled for 29th September to provide updates where possible and continue engagement around construction updates and ways to provide a touchpoint for escalation issues

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

information. Following recent discussions, no written confirmation of proposals, assessments, or mitigation measures has been received, and there remains a lack of clarity between the application documents and information discussed in meetings.

There is also no information or documentation provided to demonstrate that alternative approaches, access arrangements, or less intrusive means of delivering the stated objective have been considered in relation to my property. In the absence of such evidence, it is not possible to assess whether the rights sought represent the minimum necessary interference with private property rights.

National Grid is seeking broad, flexible rights over my property, but without sufficient property-specific justification or settled parameters it cannot be demonstrated that those rights represent the minimum necessary interference with my land.

The information currently available does not enable an assessment of the nature, duration and extent of the interference that may result from the exercise of the rights sought, nor whether the statutory tests in Sections 122 and 123 of the Planning Act 2008 are met.

For these reasons, I continue to object to the proposed acquisition of rights over my property on the basis that necessity and proportionality have not been demonstrated.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

168. AP 168 - Daniel James Bickford

168.1 Person with Interest in Land (PIL) Reference ID: 5663

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed interference with my land rights through the acquisition of a temporary access easement over plot G-4/53, at 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG, registered title number EX681970. Under Sections 122 and 123 of the Planning Act 2008, the compulsory acquisition of rights should only be authorised where the applicant can demonstrate that the rights sought are necessary, proportionate and supported by a compelling case in the public interest. The Department for Communities and Local Government Guidance further requires a clear justification for the extent of any rights sought and that interference with private rights is no greater than is reasonably necessary. I do not consider that National Grid has adequately demonstrated that these requirements have been met. The rights sought in the application are broad and potentially permit a wide range of activities. However, during discussions, National Grid representatives have indicated	Summary of Objection The AP's objection concerns interference with land rights through the acquisition of a temporary access easement over plot G-4/53, 548 Rayleigh Road, Hutton, Brentwood, Essex, CM13 1SG (EX681970). The AP submits that the rights sought are broad in their terms, that key information remains outstanding at this stage, and that members of the household hold protected characteristics. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold. The Applicant's DCO submission sought temporary possession powers (Class 7) for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response Following Compulsory Acquisition Hearing 2 the Applicant met with the AP on site, and subsequently confirmed in writing to the AP's land agent ahead of Compulsory Acquisition Hearing 3 that the Applicant will not seek to acquire a subsoil interest from the land fronting their land holding at 548 Rayleigh Road in relation to their title compromising part of plot G-4/53. The Applicant will continue to seek rights pursuant to the DCO, as the AP's title does not form the entirety of this plot G-4/53 but its assessment is that no physical works will take place over the AP's land holding and, accordingly, no rights will be required to be compulsorily acquired. The Applicant confirms that the AP will continue to receive notification in respect of the DCO due to the continued inclusion of plot G-4/53. This has been confirmed to the AP's land agent. It can be explained further at the September meeting if there is any confusion on this point.

Please summarise (in no more than 1500 words) the reason(s) for your objection

that the intended use may be more limited than the powers sought. Despite this, the application documents have not been amended, and there remains uncertainty as to the actual extent of rights required and how they would be exercised.

In addition, key information necessary to assess the proportionality of the interference remains outstanding. This includes details of the construction programme, duration and sequencing of works, working hours, traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures. National Grid has also indicated that potential mitigation for impacts on my household, including measures to reduce noise at source, is being considered. National Grid has been made aware that members of my household have protected characteristics which require particular consideration when assessing the impacts of the proposed rights; however, no final assessment, mitigation strategy, implementation plan or supporting documentation has been provided. In the absence of this information, it is not possible to understand how these matters have been taken into account or how they inform the assessment of proportionality.

Whilst engagement has taken place, responses have largely been generic and have not provided sufficient property-specific

Applicant's Response

A further meeting was held with the Applicant, the AP and their land agent at the AP's home on 7th July 2026 to further understand matters relating to protected characteristics and to provide an update on the construction programme, duration and sequencing of works, working hours traffic and road management arrangements, associated utility works, construction impacts, and mitigation measures as requested. A summary of the meeting containing information on these topics was subsequently provided in writing to the AP and their agent. A further meeting is scheduled for 29th September to provide updates where possible and continue engagement around construction updates and ways to provide a touchpoint for escalation issues.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

Please summarise (in no more than 1500 words) the reason(s) for your objection

information. Following recent discussions, no written confirmation of proposals, assessments, or mitigation measures has been received, and there remains a lack of clarity between the application documents and information discussed in meetings.

There is also no information or documentation provided to demonstrate that alternative approaches, access arrangements, or less intrusive means of delivering the stated objective have been considered in relation to my property. In the absence of such evidence, it is not possible to assess whether the rights sought represent the minimum necessary interference with private property rights.

National Grid is seeking broad, flexible rights over my property, but without sufficient property-specific justification or settled parameters it cannot be demonstrated that those rights represent the minimum necessary interference with my land.

The information currently available does not enable an assessment of the nature, duration and extent of the interference that may result from the exercise of the rights sought, nor whether the statutory tests in Sections 122 and 123 of the Planning Act 2008 are met.

For these reasons, I continue to object to the proposed acquisition of rights over my property on the basis that necessity and proportionality have not been demonstrated.

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

169. AP 169 - Jane Elizabeth Smith

169.1 Person with Interest in Land (PIL) Reference ID: 15224

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant’s Response

We do not want this

Summary of Objection

No written reasons for objection have been provided by the AP.

Land Rights Sought

The Applicant understands that the AP's objection concerns the following land interests held by the AP within the Project Order Limits (as per the Land Rights Tracker): Freehold. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

The Applicant has engaged with the AP in respect of the land rights sought. V2 HoTs were issued to the AP on 26 March 2026, which included an offer of a meeting to discuss the terms. A telephone call was held with the AP on 11 May 2026. The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on 4 June 2026, at which land rights and Heads of Terms matters were discussed. The Applicant remains committed to continuing to engage with the AP and their representatives with a view to reaching a voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The AP has not made clear the specific basis on which they object to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP") and, therefore, the Applicant assumes that the AP's objection is one of principle.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) which acknowledges that for long, linear schemes it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset. The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and have been sought proportionately. The CA and TP powers sought prioritise temporary possession during construction and secure only the smallest necessary permanent land and rights afterwards.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant is satisfied that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met, as set out in detail in the 4.1 Statement of Reasons (Issue B) [REP3-010] and its submissions at Compulsory Acquisition Hearing 1. The Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily. Similarly, the Applicant is satisfied that the requirements of Section 123 of the Planning Act 2008 are met, as a request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project.

170. AP 170 - ScottishPower Renewables UK Limited

170.1 Person with Interest in Land (PIL) Reference ID: 10227

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
ScottishPower Renewables UK Limited ("SPRUKL") is the landowner of a consented Nationally Significant Infrastructure Project comprising offshore wind generation and associated onshore transmission infrastructure and is therefore directly affected by the Proposed Development. While it does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests. In particular, SPRUKL submits that the Applicant has failed to comply with the requirements of Sections 122 and 123 of the Planning Act 2008 and the Department for Communities and Local Government Guidance (September 2013) on compulsory acquisition. Section 122(2) requires that land or rights may only be acquired where they are necessary for the development or to facilitate it, and Section 122(3) requires a compelling case in the public interest. SPRUKL's position is that the Applicant has not demonstrated that interference with SPRUKL's land or rights is necessary, as the Proposed Development	Summary of Objection The AP does not object to the principle of reinforcing the electricity transmission network but objects to the extent and justification of the powers sought. The AP submits that the requirements of Section 122(2) of the Planning Act 2008 have not been met, that a compelling case in the public interest has not been demonstrated to satisfy Section 122(3), and that the AP's existing infrastructure corridors conflict with the proposed development. The AP further submits that the Applicant's objectives could be achieved through the use of protective provisions or voluntary agreements rather than compulsory acquisition. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, Easement Right or Privilege, and Restrictive Covenants. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 1 (compulsory acquisition of land), (b) Class 2 (overhead line infrastructure), (c) Class 3 (underground cable infrastructure), (d) Class 4 (overhead line and underground cable infrastructure) and (e) Class 5 (access). The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German, issued Heads of Terms version 2 to the AP's agent on 2 April 2026. The Applicant acknowledges the concerns raised by East Anglia One Limited regarding the need for uninterrupted access. The Applicant confirms that the road

Please summarise (in no more than 1500 words) the reason(s) for your objection

appears to conflict with existing and consented SPRUKL infrastructure corridors in a manner that could reasonably be avoided through protective provisions or voluntary agreements. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified restrictions on the tenants of SPRUKL's ability to access, operate and maintain its infrastructure. The statutory test requires that land be needed rather than merely desirable or convenient, and SPRUKL considers that this threshold has not been met.

Furthermore, although SPRUKL recognises the general public benefits associated with the Proposed Development as transmission infrastructure, the Applicant has not demonstrated a compelling case in the public interest in respect of the specific interference with SPRUKL's interests, as required by Section 122(3). The assessment of public interest must consider the balance between the benefits of the scheme and the harm caused, and in this case there has been insufficient consideration of the cumulative interaction between two nationally significant infrastructure projects. SPRUKL's, EA1L's & EA3's infrastructure contributes to national renewable energy generation and decarbonisation objectives, and any restriction on its operation, maintenance or

Applicant's Response

closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, as secured in Paragraph 5.8.3 of the **7.3 Outline Construction Traffic Management Plan [Revision F]**. Existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with East Anglia One Limited and Scottish Power.

. Any East Anglia Three or East Anglia One landscaping that is removed by virtue of the works required under the project will be reinstated with either the same planting or suitable alternatives. A draft set of Protective Provisions was provided by the AP to the Applicant on 30 June 2026. The Applicant has considered these provisions in the context of the heads of terms for the legal interface agreement also being negotiated and provided the AP with an updated version of the provisions on 15 July 2026. The Protective Provisions will be submitted at Deadline 7. In relation to plot B20/199, the classification of this plot has been changed to Class 8, which has been presented at Deadline 6. There are no alternatives for the overhead line alignment at this location, which must connect into the north side of Bramford Substation noting the presence of the Bramford to Twinstead overhead lines exiting the substation on the western side and the Projects proposed JC route overhead line to the south of the substation.

The applicant has considered the cumulative effects of the Norwich to Tilbury project with other existing and, or approved developments, including the East Anglia Three project, on common receptors. This assessment is provided in 6.17.1 Environmental Statement Chapter 18 – Cumulative Effects – Response Update **[Revision B]**.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in

Please summarise (in no more than 1500 words) the reason(s) for your objection

future development has the potential to undermine those objectives.

In addition, the Applicant has not satisfied the requirements of the DCLG Guidance, which makes clear that compulsory acquisition should only be used where there is a compelling justification, that reasonable alternatives have been properly considered and that the extent of acquisition is proportionate. The Guidance requires that applicants minimise interference and use compulsory powers only as a last resort following reasonable negotiation. In this case, SPRUKL considers that the rights sought are disproportionate, that insufficient steps have been taken to minimise the extent of interference and that meaningful agreement has not yet been achieved. The proposals risk imposing safeguarding constraints and operational limitations.

The principles underlying Section 123 of the Planning Act 2008 are also engaged, given the nature of SPRUKL's infrastructure as nationally important energy infrastructure.

Those principles require that land should not be acquired where this would cause serious detriment to the carrying on of the undertaking. SPRUKL is concerned that the Proposed Development may result in such detriment by restricting access for maintenance and emergency works,

Applicant's Response

demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights

Please summarise (in no more than 1500 words) the reason(s) for your objection

increasing safety risks and imposing operational inefficiencies.

Finally, SPRUKL considers that there has been insufficient engagement and negotiation in accordance with the DCLG Guidance, which requires applicants to seek agreement wherever possible and to use compulsory acquisition only as a measure of last resort. While discussions have taken place, they have not resulted **[COMMENT TRUNCATED AT THIS POINT]**

Applicant's Response

are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have referenced alternative technical solutions for electricity transmission, in particular the use of high voltage direct current ("HVDC") technology and/or offshore routing. The Applicant's position in response to these alternatives is set out in detail in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]** and in the Applicant's Written Representation **[REP1-006]**, however the Applicant provides the following further response for the assistance of the Examining Authority. The Applicant made a considered assessment of offshore and HVDC technologies as part of its options assessment, with the results published in the 2.4 Preliminary Environmental Information Report (Chapter 3: Alternatives and Design Evolution) **[APP-058]**. The assessments concluded that offshore and HVDC technologies were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and resilience that is required for the GB Transmission network. Additionally, HVDC underground cable technology is not currently available in the lengths required by the Project and would require a converter station either end of the route. Constructing a converter station at or near Bramford Substation would be technically challenging and potentially introduce additional or greater effects on local residents than the current scheme. Given the Applicant's statutory obligation to provide cost efficient transmission services whilst maintaining system security, it concluded that HVDC options did not offer a technically viable or cost-effective solution to connect the required generation capacity to the grid.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

171. AP 171 - Annabel Gardiner (Lord Rayleigh's Farm Ltd)

171.1 Person with Interest in Land (PIL) Reference ID: 1275

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
REP1-247 and REP3-124 Purpose of Representation – from a tenants and landowners perspective The purpose of this representation is to ensure the scheme is designed and implemented in a manner sympathetic to existing land uses, particularly the Estate's ongoing commercial farming and shooting operations. We also highlight concerns with the engagement process and the potential environmental and operational impacts of the proposals. Key Concerns Environmental Impacts - We are particularly concerned about the effect on local listed buildings and their settings. The mitigation measures proposed to date appear insufficient to fully address potential harm. 1. Compulsory Acquisition of Land - The extent of compulsory acquisition proposed is considered unnecessary and will have a significant adverse impact on the Estate's commercial shoot operations. 2. Design Issues - There is no clear justification provided for the decision not to use	Summary of Objection The AP raises a substantial number of grounds of objection including: the environmental impact on listed buildings in the area; that the extent of compulsory acquisition is unnecessary and will adversely impact the AP's commercial shoot; that there is no justification for failing to use underground cabling; safety concerns associated with the use of agricultural machinery near overhead cables; concerns about the impact of construction traffic on small rural roads around Fairstead; inadequate stakeholder engagement; and concerns about soil and drainage. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Leasehold, Occupation, Freehold, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 1 (compulsory acquisition of land), (b) Class 2 (overhead line infrastructure), (c) Class 3 (underground cable infrastructure), (d) Class 4 (overhead line and underground cable infrastructure), (e) Class 5 (access) and (f) Class 6. The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
underground cabling, which could reduce surface impacts. Additionally, safety concerns arise regarding machinery working near overhead cables. 3. Construction Impacts - The construction phase is expected to have a massive impact on the small rural roads around Fairstead, causing disruption, safety issues, and inconvenience to local residents and businesses. 4. Stakeholder Engagement - Engagement to date has been very poor. Notifications have been late, information insufficient or inaccurate, and responses to submitted concerns have not been forthcoming. This has caused unnecessary stress and uncertainty. 5. Soil and Drainage - We are concerned about the long-term impacts on soil quality and drainage, particularly in haul road areas. There is insufficient detail about how soil compaction and drainage disruption will be mitigated or remediated. Engagement The Estate, together with its agent, has engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect	The Applicant's land agent, Fisher German, issued Heads of Terms version 2 to the AP's agent on 2 April 2026. A meeting was held with the AP's agent on the 15 April 2026 to discuss the proposed purchase option area and wider concerns on farm activities across the AP's land. Interactions with farming and shooting operations were also discussed to establish what mitigation measures can be put in place. Following the meeting and discussions with the appropriate project engineers, adjustments to the proposed purchase areas have been incorporated into the design. Discussions are ongoing with the AP's agent to arrange a meeting to finalise the preferred location for the permanent drainage attenuation pond situated on the AP's land. The Applicant is awaiting details from the AP's agent on specific farming and shooting activities to better understand and mitigate the impact the Project may have. Meetings were held with the AP's agent on the 20 April 2026 and the 4 June 2026 to discuss the heads of terms to progress them towards agreement. The Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and regular twice weekly meetings are conducted to triage, seek to identify common themes across PILs and identify and seek the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process and does not anticipate that the register will close for requests and consideration in the future. The focus at this time continues to be the matters that should be negotiated as part of HoTs rather than simply practical matters that would be dealt with through the usual agricultural liaison / pre-entry schedule of condition workstream at the commencement of main works. In relation to construction traffic near Fairstead, the Applicant notes the AP's concerns. At its peak, construction traffic associated with PAR 43 (Spinks Lane/Highfields Road/Spa Road/Flora Road/Faulkbourne Road/Church Hill) will consist of approximately 254 vehicles per day (12 hours, 07:00-19:00), equating to 22 vehicles per hour, approximately 1 vehicle every 3.5 minutes, over a period of approximately three months from December 2027 to February 2028. Construction traffic will be less outside of this peak period. This information is set out in 6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects [Revision B]. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
mapping, as well as an additional submission on 26th February 2026. To date, we have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution, hampering meaningful review and causing significant time and stress. The late notification of additional land required for an attenuation pond is a further example of inadequate consultation. Impact on the Estate Farming Operations - The proposals will cause significant disruption during construction, with potential long-term impacts on farming productivity, including risks of soil compaction and reduced yields. 1. Soil and Drainage - Existing drainage systems must be maintained intact, as per drainage plans provided by the Estate. We seek assurance that land disturbed will be fully restored. 2. Cable Depth - We request a minimum soil cover of 1.2 metres above cables to protect agricultural machinery and land use. 3. Construction Management - Managing the farm during construction will require significant additional time and resources for access coordination, supervision, and ongoing operational adjustments. Compulsory Acquisition and Heads of Terms	mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. Mitigation measures associated with addressing inconvenience to local communities and residents are set out in 7.2 Outline Code of Construction Practice [Revision G] and 7.3 Outline Construction Traffic Management Plan [Revision F] and include measures relating to community liaison and awareness raising of periods of noisy or disruptive activity. In relation to the positions of towers TB116 and TB117, the Applicant and its delivery partners will seek to assess micro-siting suggestions at the detailed design stage. However, it should be noted that the position of TB116 is restricted by the long spans and maintaining the electrical clearances required. The Applicant notes concerns raised by certain APs regarding the nature of permanent access rights sought by the Applicant. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO. In relation to the use of underground cabling, the substantial additional cost of underground cabling has been set out in the application documents, alternative routes would lead to increased effects, and the heritage effects of the scheme have been agreed with Historic England to be acceptable in policy terms. The matters raised in relation to potential impacts on locally listed buildings and their settings have previously been considered and addressed in 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] (pages 254–256). As set out in that submission, locally listed buildings are treated as non-designated heritage assets within the Applicant's assessment, and the details of mitigation for these

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We are not yet in a position to negotiate Heads of Terms, pending further instruction from our agent. It is critical that the extent of land acquisition is fully justified and minimised. A properly designed scheme is essential to reduce impacts on the Estate. Environmental and Landscape Considerations The development will result in disruption to landscape character and farming practices. This representation aims to ensure impacts are minimised and appropriately mitigated. Pylon Locations - TB116 should be repositioned as far east as possible toward the hedged boundary to reduce farming impacts. - TB117 should be at least 40 metres from the southern field boundary to allow machinery access. Permanent Access Routes (Plan 1275) We request permanent access routes follow existing field boundaries rather than cross through fields. Biodiversity Net Gain (BNG) Woodland identified for BNG within Plan 1275 must be removed from Order Limits, as it is not available for sale and is integral to the Estate's commercial shooting operations. Solar DCO Interaction	assets are contained in 7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G] secured by the relevant requirements in 3.1 Draft Development Consent Order [REP5-060]. Where locally listed buildings are assessed to be of medium value or lie within the Order Limits, any potential impacts on their setting are appraised within the same framework as other non-designated assets, with harm considered and mitigated as practicable through the mitigation hierarchy. The Applicant has applied the mitigation hierarchy to the Project as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135], 5.6 Planning Statement [Revision B], and through consultation with heritage stakeholders, including Local Planning Authority historic environment advisers and Historic England. The mitigation hierarchy applied comprises: • Avoidance (Embedded Mitigation); • Reduction (Standard Mitigation); and • Additional Measures. The Applicant has detailed these mitigation measures in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] – HE 1.36, where the mitigation provided, or the reasons why further mitigation is not considered necessary, are set out for designated heritage assets assessed as experiencing mid-level less than substantial harm during both the construction and operation phases. This approach demonstrates that the mitigation hierarchy has been systematically applied, ensuring that potential harm to heritage assets, including locally listed buildings, is avoided, reduced or mitigated where practicable. Those locally listed buildings assessed as being of low or negligible value and located outside the Order Limits would not experience significant effects from changes to their setting. Any harm would be at the very low end of the harm scale given their value and the nature of potential impacts. In relation to Heads of Terms, the Applicant will seek, wherever reasonably practicable, to enter into voluntary agreements with those affected by the Project. The Applicant has served Heads of Terms on affected persons where negotiations have been sufficiently advanced. Heads of Terms are, by their nature, a record of ongoing negotiations and will be subject to change as discussions continue. Where Heads of Terms have not yet been served, this will be because negotiations have not been at a stage where it would be

Please summarise (in no more than 1500 words) the reason(s) for your objection

The land is subject to an approved DCO for Longfield Solar Farm, with existing third-party rights. Early coordination between National Grid, the Solar Farm, and the Estate is essential to minimise conflict.

Shooting and Farming Operations

Two key shooting drives will be affected, potentially making the shoot unviable during construction. We request National Grid works with the Estate to avoid shooting seasons and minimise farming disruption. Failure to do so may lead to financial losses and compensation claims.

Final Note - The cumulative burden of the process so far — including poor engagement and unaddressed consultation points — has caused considerable stress and operational challenges. We request that these concerns be fully taken into account in the examination.

Applicant's Response

appropriate to do so. The Applicant is committed to continuing to progress Heads of Terms with all affected persons as the Project advances. In the event that a DCO is granted for the Project, the Applicant intends to continue its negotiations in good faith, and the inclusion of compulsory acquisition powers in a DCO would not preclude the Applicant from entering into a voluntary agreement with an affected person at any stage.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

In relation to the impact of construction works on affected persons, the Applicant draws attention to the commitments set out in 7.2 Outline Code of Construction Practice **[APP-172]** and associated appendices, which contain detailed controls in relation to, amongst other things, noise, dust, vibration, working hours, traffic management and the management of surface and ground water. The Code of Construction Practice will be secured by requirement in the DCO and the Applicant will be required to submit and obtain approval for a Code of Construction Practice in respect of each construction area before any development can commence within that area. In addition to the controls set out in the Code of Construction Practice, the Applicant has provided a series of written commitments (set out in 7.5 Written Commitments **[APP-175]**) that apply specific measures in respect of construction, in order to avoid, mitigate and manage the effects of the Project during the construction phase. As these documents demonstrate, the impacts of construction works on all affected persons, including landowners and those living or working in the vicinity of the Project, have been carefully considered throughout the development of the Project's proposals.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In relation to the AP's concerns about agricultural land and soil impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [**Revision B**]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [**Revision B**]).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [**Revision B**]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

172. AP 172 - Lucy Alexandra Nutting

172.1 Person with Interest in Land (PIL) Reference ID: 7972

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1) the consultations have been defective 2) there are fundamental errors in National Grid's DCO application, 3) I do not consider the compulsory acquisition of my land and rights to be in the public interest, particularly where reasonable alternatives are available, as proposed previously. 4) I do not consider that the Applicant has properly considered reasonable alternatives to reduce the impact on my holding. 5) The Applicant has not listened to constructive feedback from landowners, or taken sufficient steps to reduce impacts and mitigate losses. 6) The rights being sought may be wider than necessary for the scheme. 7) The Heads of Terms are still not in a reasonable or acceptable format. 8) The current Heads of Terms impose unfair and unreasonable restrictions on landowners. I do not consider that the Applicant has demonstrated that the interference with my land	Summary of Objection The AP contends that the consultations were defective and that National Grid's DCO application contains fundamental errors; that compulsory acquisition of the AP's land and rights is not in the public interest where reasonable alternatives exist; that the Applicant has not properly considered or adopted reasonable alternatives to reduce impacts on the AP's holding or acted on constructive feedback from landowners to mitigate losses; that the rights sought may be broader than necessary; that the Heads of Terms remain unacceptable and impose unfair restrictions; and that the Applicant has not demonstrated the interference with the AP's land and rights is necessary, proportionate or limited to what is reasonably required. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Leasehold, Occupation, Freehold, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 1 (compulsory acquisition of land), (b) Class 2 (overhead line infrastructure), (c) Class 3 (underground cable infrastructure), (d) Class 4 (overhead line and underground cable infrastructure), (e) Class 5 (access) and (f) Class 6. The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
and rights is necessary, proportionate, or limited to what is reasonably required.	Consolidated Response In relation to Heads of Terms, the Applicant will seek, wherever reasonably practicable, to enter into voluntary agreements with those affected by the Project. The Applicant has served Heads of Terms on affected persons where negotiations have been sufficiently advanced. Heads of Terms are, by their nature, a record of ongoing negotiations and will be subject to change as discussions continue. Where Heads of Terms have not yet been served, this will be because negotiations have not been at a stage where it would be appropriate to do so. The Applicant is committed to continuing to progress Heads of Terms with all affected persons as the Project advances. In the event that a DCO is granted for the Project, the Applicant intends to continue its negotiations in good faith, and the inclusion of compulsory acquisition powers in a DCO would not preclude the Applicant from entering into a voluntary agreement with an affected person at any stage. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate.

The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

accepted the application for the Project into examination having regard to the adequacy of preapplication consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

In relation to the impact of construction works on affected persons, the Applicant draws attention to the commitments set out in 7.2 Outline Code of Construction Practice **[APP-172]** and associated appendices, which contain detailed controls in relation to, amongst other things, noise, dust, vibration, working hours, traffic management and the management of surface and ground water. The Code of Construction Practice will be secured by requirement in the DCO and the Applicant will be required to submit and obtain approval for a Code of Construction Practice in respect of each construction area before any development can commence within that area. In addition to the controls set out in the Code of Construction Practice, the Applicant has provided a series of written commitments (set out in 7.5 Written Commitments **[APP-175]**) that apply specific measures in respect of construction, in order to avoid, mitigate and manage the effects of the Project during the construction phase. As these documents demonstrate, the impacts of construction works on all affected persons, including landowners and those living or working in the vicinity of the Project, have been carefully considered throughout the development of the Project's proposals.

173. AP 173 - Nigel Edwin Markham

173.1 Person with Interest in Land (PIL) Reference ID: 101

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
One of the NtoT pylons is planned to be situated at the corner of our field. There are normal pylons and a gas main crossing the same corner, but despite numerous requests, no one has been able to clarify for us how/where the normal pylons and the gas main will be relocated and the implications to us. We haven't been told the implications to us of the NtoT pylons either outwith it being on our land. We need a realistic image of what the NtoT pylons are anticipated to look like so that the impact to our land can be fully assessed, for example loss of potential development value. Also we have no information on what compensation we would be offered if any of our land was to be put under CA or TP. We need all this information to be able to consider the impact of the NtoT plans. Lastly with modern engineering capabilities, we find it hard to believe that these cables can't be put underground as they have been elsewhere where it has been deemed to be more important to do so.	Summary of Objection The AP's objection raises the following concerns: there is a Norwich to Tilbury pylon at the corner of the AP's field; normal pylons and a gas main already cross at the same corner; no clarification has been provided on whether the normal pylons and the gas main will be relocated; no information has been provided about the implications of the Norwich to Tilbury pylon; the AP has not been provided with a realistic image of how the project will look; no information about compensation has been received; the AP requires further information to consider the full impact; and the capability to place the works underground has not been explained. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure) and (c) Class 5 (access). Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this AP holds an interest.

The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation

Consolidated Response

The Applicant notes that no Heads of Terms have been issued to this AP as they are a Category 2 interest.

The Applicant confirms that it will seek to engage further with the AP as the Project advances.

In response to the AP's concerns, the Applicant wishes to clarify that there are in fact two Norwich to Tilbury pylons within the AP's plots, namely TB212 and TB213, and not one as the AP has stated. The angle pylon was moved northwards by one span following non-statutory consultation, to increase separation from the nearest residential property and following an alignment change in that area. In relation to the suggestion that the alternative of adopting or closing the parallel existing 132 kV overhead line should be considered, this alternative is not preferred by the Applicant due to the interaction of that alignment with a high-pressure gas pipeline, the transfer of residential effects that would result, the oversail of a woodland cemetery, and a range of other environmental constraints.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]**

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

174. AP 174 - Elizabeth Anne Sprunt

174.1 Person with Interest in Land (PIL) Reference ID: 6786

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
One of the NtoT pylons is planned to be situated at the corner of our field. There are normal pylons and a gas main crossing the same corner, but despite numerous requests, no one has been able to clarify for us how/where the normal pylons and the gas main will be relocated and the implications to us. We haven't been told the implications to us of the NtoT pylons either outwith it being on our land. We need a realistic image of what the NtoT pylons are anticipated to look like so that the impact to our land can be fully assessed, for example loss of potential development value. Also we have no information on what compensation we would be offered if any of our land was to be put under CA or TP. We need all this information to be able to consider the impact of the NtoT plans. Lastly with modern engineering capabilities, we find it hard to believe that these cables can't be put underground as they have been	Summary of Objection The AP's objection raises the following concerns: there is a Norwich to Tilbury pylon at the corner of the AP's field; normal pylons and a gas main already cross at the same corner; no clarification has been provided on whether the normal pylons and the gas main will be relocated; no information has been provided about the implications of the Norwich to Tilbury pylon; the AP has not been provided with a realistic image of how the Project will look; no information about compensation has been received; the AP requires further information to consider the full impact; and the capability to place the works underground has not been explained. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not

Please summarise (in no more than 1500 words) the reason(s) for your objection

elsewhere where it has been deemed to be more important to do so.

Applicant's Response

generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation

Consolidated Response

In response to the AP's concerns, the Applicant wishes to clarify that there are in fact two Norwich to Tilbury pylons within the relevant plots, namely TB212 and TB213. The angle pylon was moved northwards by one span following non-statutory consultation, in order to increase the separation from the nearest residential property and following an alignment change in that area. In relation to the suggestion that the alternative of adopting or closing the parallel existing 132 kV overhead line should be considered, this alternative is not preferred by the Applicant due to the interaction of that alignment with a high-pressure gas pipeline, the transfer of residential effects that would result, the oversail of a woodland cemetery, and a range of other environmental constraints.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

175. AP 175 - Silke Pinson-Roxburgh

175.1 Person with Interest in Land (PIL) Reference ID: 17619

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
It will impepde on my rights to my own property	Summary of Objection The AP's objection is that the Project will impede on the AP's rights to her own property. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure) and (d) Class 5 (access). The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that no Heads of Terms have been issued to this AP at this stage as a Category 2 interest holder. The Applicant confirms that it will seek to engage with the AP as the Project advances. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

176. AP 176 - Colin Pinson-Roxburgh

176.1 Person with Interest in Land (PIL) Reference ID: 17618

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
because of the disruption it will cause	Summary of Objection The AP's objection is that the Project will cause disruption to the AP's property and interests. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure) and (d) Class 5 (access). The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant notes that no Heads of Terms have been issued to this AP at this stage as a Category 2 interest. The Applicant confirms that it will seek to engage with the AP as the Project advances. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

177. AP 177 - Paul Lanham

177.1 Person with Interest in Land (PIL) Reference ID: 539

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
I object to the proposed interference with my land rights at Dukes Farm, [REDACTED]. The proposed acquisition of rights and/or temporary possession would result in a substantial and disproportionate interference with the operation of my farm business and my use and enjoyment of the land. Dukes Farm is a long-established working agricultural holding. The land affected forms an integral part of the farming operation and supports livestock grazing, a commercial turkey enterprise, agricultural activities and associated business interests. The proposed rights would interfere with the day-to-day management of the farm, impact grazing land, disrupt farming operations and create significant biosecurity concerns associated with third-party access, vehicles and equipment entering the holding. The turkey enterprise operates under strict biosecurity requirements. Any increase in third-party access across the farm presents a significant risk to those operations and to the continued viability of that part of the business.	Summary of Objection The AP's objection is that the Project constitutes a disproportionate interference with the AP's farm business operation at Dukes Farm, which is described as a long-established working agricultural holding. In particular, the AP raises concerns about the impact of the Project on the AP's turkey enterprise, which operates under strict biosecurity requirements, and on the fishing lake situated within the farm. The AP further submits that alternatives to the proposed alignment have been identified and have not been adequately considered. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure) and (b) Class 5 (access). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German, held a meeting with the AP's agent on 11 May 2026, at which ongoing negotiations regarding the Heads of Terms were discussed. At that meeting, the access into the field to the side of the residential property was confirmed as a permanent right of access, which would be exercised infrequently for the purposes of periodic inspections and maintenance, and will not be used during construction. The Applicant is keen to continue negotiations in respect of the Heads of Terms and to reach a voluntary agreement. In relation to UKPN's access requirements, National Grid Electricity Transmission clarified at that meeting that the access to the field is a permanent right of access and is not a

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Biosecurity is a critical consideration for livestock enterprises and the proposed rights would introduce ongoing uncertainty and risk. In addition, the proposals would affect areas associated with the fishing lake and surrounding land which form an important part of the wider farm business. Any access associated with the project, whether temporary, permanent, occasional, maintenance-related or otherwise, represents an interference with my land rights and with the normal operation of the farm. The issue is not simply the frequency of access but the imposition of rights over private agricultural land where less harmful alternatives are available. I do not consider that National Grid has demonstrated that the interference with my land rights is necessary or proportionate as required by Sections 122 and 123 of the Planning Act 2008. Alternative access arrangements have been identified and raised during the examination process which would significantly reduce the impact on Dukes Farm and the wider farming business. In these circumstances, I do not believe that a compelling case in the public interest has been demonstrated for the extent of the interference proposed at Dukes Farm. For these reasons, I object to the compulsory acquisition and/or temporary possession of	temporary construction-phase access. The Applicant and UKPN have been exploring a potential alternative access route and are continuing to engage on the matter. Both parties are currently assessing the viability of the option, taking into account the relevant land, access and operational considerations. Discussions remain ongoing. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed (including discussions regarding specific biosecurity measures required). We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B] for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The Applicant is fully aware of the biosecurity requirements associated with the AP's turkey enterprise and this has been a specific focus of discussion. During the construction and operation of the Project, the Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for

Please summarise (in no more than 1500 words) the reason(s) for your objection

rights affecting Dukes Farm and request that the Examining Authority gives full consideration to the alternative access arrangements and the significant impact that the proposed interference would have on my property, farming business and livelihood.

Applicant's Response

disturbance are considered on a case-by-case basis, if impact on farming operations can be proven. Particular agricultural matters, including those relating to biosecurity, can also be addressed through voluntary land agreements.

Regarding the AP's proposal concerning the location of tower TB228, The Applicant has previously considered crossing the overhead line to the west of the gas pipeline. This was confirmed to the AP in writing on 18th June 2026 with the explanation set out below.

Technical reasons prevent the Applicant from re-using the specific location of PSC8 for TB228 and therefore the Applicant seeks a new location for the proposed tower. Routeing has considered deviation to the west of Dukes Farm, to avoid the farm and fishing lake entirely. In considering this change, the Applicant must balance the loss of fishing income against the effect of the loss of development opportunity and impact on the consented Dunton Hills Garden Village. The Applicant acknowledges this is not favoured by the AP but must take a balanced view, taking into account the effects of alternative alignments to those parties, land and activities affected.

In addition, any such location to the west of the National Gas Transmission pipeline, coupled with reconnecting back to TB227, would not avoid at least partial oversail of the lake and would require the cessation in part, of fishing activities.

With the constraints outlined above, the Applicant is unable to avoid the fishing lake and therefore this may become unusable, in which case you will be compensated in line with the Compensation Code.

We continue to work with the AP's agent to gain understanding of potential losses and impacts to the farm. Further to the most recent meeting with your agent on 11th May 2026 and subsequent follow up email, the Applicant awaits financial details relating to the fishing lake, bio security requirements relating to the turkey business and supplemental feeding of the cattle to address ongoing discussion regarding accommodation works.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in

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Applicant's Response

full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a

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Applicant's Response

consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The

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Applicant's Response

Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire

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Applicant's Response

by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

178. AP 178 - Ben Knighton

178.1 Person with Interest in Land (PIL) Reference ID: 3677

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. An extension for drainage from contaminated digging of the trench and laying of cables direct to the brook on our land (which runs to the River Stour) 2. Interruption of land drains, probably irredeemable, leading to loss of fertility and value of cultivable land 3. Raising of clay and stones close to the topsoil, later subsidence of soil over the trench, and soil compaction, leading to loss of fertility and value of cultivable land 4. 50m pylons and the cables to the west and east will still daunt the plot 200m from where I was born 5. Permanent structures, above-ground apparatus, tracks, and easements on the plot, which will interfere with agricultural operations	Summary of Objection The AP's objection raises the following concerns: the risk of extension of drainage from contaminated digging; the interruption of land drains; the raising of clay and stones close to the topsoil; that 50-metre pylons and cables will dominate the AP's plot; and that the existence of permanent structures, tracks and easements will interfere with the AP's agricultural operations. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold and Occupation. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure) and (c) Class 5 (access). The Applicant is seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German issued Heads of Terms version 2 to the AP's agent on 26 March 2026. Regular meetings have been held with the AP's agent since that date, most recently on 4 June 2026. The Applicant remains committed to reaching a voluntary agreement with the AP. Matters relating to compensation and reinstatement will be included within the Heads of Terms. In relation to the AP's concerns about land drainage, the Applicant confirms its commitment to ensuring that there is no detriment to land drainage as a result of the Project. The

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Applicant's Response

approach to drainage is described in Commitment AS05 and Commitment W14 within 7.2 Outline Code of Construction Practice **[Revision G]**, to which the Applicant draws the AP's attention. Details of the strategy for managing land drainage and surface water runoff from land within the Order Limits is also presented within application document **8.2 Drainage Strategy DCO [Revision D]** and application document **7.2 Outline Code of Construction Practice [Revision G]**.

Proposed works in the area of concern for the AP are shown in application document **6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design (Final Issue B) [REP4-109]** - Section D Page 37. The Applicant's drainage strategy for this section is addressed in **Application document 8.2 Drainage Strategy DCO [Revision D]** issued at Deadline 7, which outlines the Applicant's approach to drainage. This includes using the Sustainable Drainage Systems (SuDS) hierarchy and SuDS principals to ensure that runoff from the construction swathe is treated prior to outfall. Within this section there are two attenuation features proposed including an infiltration basin and an attenuation basin and outfall where infiltration is considered unlikely to be suitable. These are temporary features which will be removed following construction. Further detailed information will be provided at detailed design and provided through the surface water management plan identified within the 7.2 Outline Code of Construction Practice **[Revision G]** and secured through this code within Requirement 3 of the draft DCO.

The approach to soil management is detailed in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (Final Issue A) [Revision D]**. This outlines the protective measures and methodologies that will be used to protect the soil and prevent mixing of topsoil and subsoil. The outline plan will be further developed by the Main Works Contractor as part of the design development of the project. The Applicant is able to confirm that the installation of cables underground via open trenching has been completed successfully by the Applicant on a number of previous projects, with agricultural fields returned to full production following the works.

In relation to the AP's concerns about pylons and cables to the west and east, the Applicant draws the AP's attention to the fact that the underground cable section at Great Horkesley does not involve the erection of pylons on the AP's land, and the nearest pylons to the AP's land are situated approximately 1 kilometre away. The Applicant is also aware of the disruption caused during construction. Within the plots relating to concern no. 4, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

cables will be buried with only small link pillar compounds potentially located above ground. Following construction the land will be returned to its current use.

In relation to the AP's concerns about permanent structures etc. (concern no. 5), there is the potential for small (5m x 5m) fenced compounds to be located within this area for the link pillars associated with joint bays should the detailed design identify that joints are required in this location. Otherwise there will be no retained permanent assets and only easements and rights of access will be retained which do not require permanent above ground infrastructure such as tracks.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

During the construction and operation of the Project, the Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[APP-138]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

In relation to the impact of construction works on affected persons, the Applicant draws attention to the commitments set out in 7.2 Outline Code of Construction Practice **[APP-172]** and associated appendices, which contain detailed controls in relation to, amongst other things, noise, dust, vibration, working hours, traffic management and the management of surface and ground water. The Code of Construction Practice will be secured by requirement in the DCO and the Applicant will be required to submit and obtain approval for a Code of Construction Practice in respect of each construction area before any development can commence within that area. In addition to the controls set out in the Code of Construction Practice, the Applicant has provided a series of written commitments (set out in 7.5 Written Commitments **[APP-175]**) that apply specific measures in respect of construction, in order to avoid, mitigate and manage the effects of the Project during the construction phase. As these documents demonstrate, the impacts of construction works on all affected persons, including landowners and those living or working in the vicinity of the Project, have been carefully considered throughout the development of the Project's proposals.

179. AP 179 - Stephen Mugliston

179.1 Person with Interest in Land (PIL) Reference ID: 2253

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The applicant has failed to explain why the land rights are required for the development or even provide details of what land rights are required. Because of this lack of detail, the applicant has failed to demonstrate that there are no alternatives and has made no genuine attempt to negotiate. During a meeting with the applicant's agent, Fisher German, stated that they could not provide any details about the reason for the proposed acquisition, nor could they explain why the applicant needed to acquire any rights over the land. They also stated that "It was unlikely that National Grid would need to compulsory purchase but retained it as a possibility as details of the rights that need to be acquired were not available....." This despite a compulsory acquisition notification being issued. For something described on the "Compulsory land acquisition schedule" as "house and premises," National Grid should have provided more information. The applicant claims a meeting took place to "review discuss and negotiate detailed clauses within Heads of Terms issue v1," but in the absence of	Summary of Objection The AP's objection raises the following grounds: the Applicant has failed to explain adequately why the land rights are required from the AP; no genuine attempt has been made to negotiate with the AP; a representative of Fisher German stated that they could not provide details about the reasons for the acquisition; the same representative stated that it was unlikely that National Grid Electricity Transmission would pursue compulsory purchase but that this was retained as a possibility; the statutory notices served on the AP do not correlate with the Land Rights Tracker; and the email correspondence received by the AP consists of statutory notices rather than genuine negotiation correspondence. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary

Please summarise (in no more than 1500 words) the reason(s) for your objection

adequate information provided by National Grid, no meaningful negotiations took place. The statutory notices do not correlate with the entries in the Land Rights Tracker documentation. There are "land rights" listed on "AENC-TQST-LAN-REP-0002 Detailed Land and Rights Negotiations Tracker - Category 1 & 2 interests", that do not appear in the statutory notifications.

The email "correspondence" that National Grid claims took place, consists of a variety of statutory notices and notifications and does not constitute a genuine attempt to negotiate.

In summary, the applicant's actions to date consist of a deluge of notices and notifications which provide no specific information about the acquisition of rights. Their agent cannot even advise the nature of the rights that National Grid want to acquire. Their approach appears to be a rushed attempt to complete procedural steps without providing detailed, specific information about how the landowner will be affected. As a result, National Grid have been unable to enter into meaningful negotiations and are unable to establish that the proposed acquisition is necessary and proportionate. Other evidence supplied to the Planning Inspectorate has clearly demonstrated that the public benefits for the scheme have been overstated and therefore National Grid cannot effectively assess that the public benefit outweighs the harm to the affected party's

Applicant's Response

agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation.

The Applicant will seek, wherever reasonably practicable, to enter into voluntary agreements with those affected by the Project. The Applicant has served Heads of Terms on affected persons where negotiations have been sufficiently advanced. Heads of Terms are, by their nature, a record of ongoing negotiations and will be subject to change as discussions continue. Where Heads of Terms have not yet been served, this will be because negotiations have not been at a stage where it would be appropriate to do so. The Applicant is committed to continuing to progress Heads of Terms with all affected persons as the Project advances. In the event that a DCO is granted for the Project, the Applicant intends to continue its negotiations in good faith, and the inclusion of compulsory acquisition powers in a DCO would not preclude the Applicant from entering into a voluntary agreement with an affected person at any stage.

The Applicant does not agree that the purpose of the rights sought has not been explained. The nature of the rights sought over each plot is identified within the draft Order, the Book of Reference, the Land Plans, the Works Plans and the Compulsory Acquisition Schedule. The rights sought are limited to those required to construct, operate, maintain, inspect, repair, renew and access the proposed electricity transmission infrastructure. In the case of this plot, the rights are required because the land lies within the area necessary for the delivery and/or operation of the Project and are sought to facilitate the proposed works and associated infrastructure. The Applicant has sought rights rather than outright acquisition wherever possible in order to minimise the extent of interference with private interests.

Please summarise (in no more than 1500 words) the reason(s) for your objection

property nor are they able to fully explore alternative arrangements that do not involve the compulsory acquisition of rights over the affected land.

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have referenced alternative technical solutions for electricity transmission, in particular the use of high voltage direct current ("HVDC") technology and/or offshore routing. The Applicant's position in response to these alternatives is set out in detail in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]** and in the Applicant's Written Representation **[REP1-006]**, however the Applicant provides the following further response for the assistance of the Examining Authority. The Applicant made a considered assessment of offshore and HVDC technologies as part of its options assessment, with the results published in the 2.4 Preliminary Environmental Information Report (Chapter 3: Alternatives and Design Evolution) **[APP-058]**. The assessments concluded that offshore and HVDC technologies were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and resilience that is required for the GB Transmission network. Additionally, HVDC underground cable technology is not currently available in the lengths required by the Project and would require a converter station either end of the route. Constructing a converter station at or near Bramford Substation would be technically challenging and potentially introduce additional or greater effects on local residents than the current scheme. Given the Applicant's statutory obligation to provide cost efficient transmission services whilst maintaining system security, it concluded that HVDC options did not offer a technically viable or cost-effective solution to connect the required generation capacity to the grid.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

180. AP 180 - June Elizabeth Mugliston

180.1 Person with Interest in Land (PIL) Reference ID: 2253, 24

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The applicant has failed to explain why the land rights are required for the development or even provide details of what land rights are required. Because of this lack of detail, the applicant has failed to demonstrate that there are no alternatives and has made no genuine attempt to negotiate. During a meeting with the applicant's agent, Fisher German, stated that they could not provide any details about the reason for the proposed acquisition, nor could they explain why the applicant needed to acquire any rights over the land. They also stated that "It was unlikely that National Grid would need to compulsory purchase but retained it as a possibility as details of the rights that need to be acquired were not available....." This despite a compulsory acquisition notification being issued. For something described on the "Compulsory land acquisition schedule" as "house and premises," National Grid should have provided more information. The applicant claims a meeting took place to "review discuss and negotiate detailed clauses within Heads of	Summary of Objection The AP's objection raises the following grounds: the Applicant has failed to explain adequately why the land rights are required from the AP; no genuine attempt has been made to negotiate with the AP; a representative of Fisher German stated that they could not provide details about the reasons for the acquisition; the same representative stated that it was unlikely that National Grid Electricity Transmission would pursue compulsory purchase but that this was retained as a possibility; the statutory notices served on the AP do not correlate with the Land Rights Tracker; and the email correspondence received by the AP consists of statutory notices rather than genuine negotiation correspondence. Land Rights Sought The Applicant understands that the AP's objection concerns the following land interests held within the Project Order Limits: Freehold, Occupation, and Easement Right or Privilege. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds a Category 2 interest: (a) Class 3 (underground cable infrastructure) and (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Terms issue v1," but in the absence of adequate information provided by National Grid, no meaningful negotiations took place. The statutory notices do not correlate with the entries in the Land Rights Tracker documentation. There are "land rights" listed on "AENC- TQST-LAN-REP-0002 Detailed Land and Rights Negotiations Tracker - Category 1 & 2 interests", that do not appear in the statutory notifications.

The email "correspondence" that National Grid claims took place, consists of a variety of statutory notices and notifications and does not constitute a genuine attempt to negotiate.

In summary, the applicant's actions to date consist of a deluge of notices and notifications which provide no specific information about the acquisition of rights. Their agent cannot even advise the nature of the rights that National Grid want to acquire. Their approach appears to be a rushed attempt to complete procedural steps without providing detailed, specific information about how the landowner will be affected. As a result, National Grid have been unable to enter into meaningful negotiations and are unable to establish that the proposed acquisition is necessary and proportionate. Other evidence supplied to the Planning Inspectorate has clearly demonstrated that the public benefits for the scheme have been overstated and therefore National Grid cannot effectively assess that the public benefit outweighs the

Applicant's Response

agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation. The Applicant will seek, wherever reasonably practicable, to enter into voluntary agreements with those affected by the Project. The Applicant has served Heads of Terms on affected persons where negotiations have been sufficiently advanced. Heads of Terms are, by their nature, a record of ongoing negotiations and will be subject to change as discussions continue. Where Heads of Terms have not yet been served, this will be because negotiations have not been at a stage where it would be appropriate to do so. The Applicant is committed to continuing to progress Heads of Terms with all affected persons as the Project advances. In the event that a DCO is granted for the Project, the Applicant intends to continue its negotiations in good faith, and the inclusion of compulsory acquisition powers in a DCO would not preclude the Applicant from entering into a voluntary agreement with an affected person at any stage.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
harm to the affected party's property nor are they able to fully explore alternative arrangements that do not involve the compulsory acquisition of rights over the affected land.	policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timely conclusion. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have referenced alternative technical solutions for electricity transmission, in particular the use of high voltage direct current ("HVDC") technology and/or offshore

Please summarise (in no more than 1500 words) the reason(s) for your objection

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routing. The Applicant's position in response to these alternatives is set out in detail in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]** and in the Applicant's Written Representation **[REP1-006]**, however the Applicant provides the following further response for the assistance of the Examining Authority. The Applicant made a considered assessment of offshore and HVDC technologies as part of its options assessment, with the results published in the 2.4 Preliminary Environmental Information Report (Chapter 3: Alternatives and Design Evolution) **[APP-058]**. The assessments concluded that offshore and HVDC technologies were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and resilience that is required for the GB Transmission network. Additionally, HVDC underground cable technology is not currently available in the lengths required by the Project and would require a converter station either end of the route. Constructing a converter station at or near Bramford Substation would be technically challenging and potentially introduce additional or greater effects on local residents than the current scheme. Given the Applicant's statutory obligation to provide cost efficient transmission services whilst maintaining system security, it concluded that HVDC options did not offer a technically viable or cost-effective solution to connect the required generation capacity to the grid.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

181. AP 181 - The Honourable John Frederick Strutt

181.1 Person with Interest in Land (PIL) Reference ID: 9897

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
REP3-158 and REP1-393 Purpose of Representation The purpose of this representation is to ensure the scheme is designed and implemented in a manner sympathetic to existing land uses, particularly the Estate’s ongoing commercial farming and shooting operations. I also highlight concerns with the engagement process, environmental and heritage impacts, and the potential operational impacts of the proposals. Consultation and Engagement The Estate, together with its agent, has engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect mapping, as well as an additional submission on 26th February 2026. To date, we have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution,	Summary of Objection The AP's objection raises a number of concerns, which can be summarised as follows: (i) inadequate engagement and consultation, with plans being provided that were incorrect and of low resolution and no substantive response yet received to the AP's submissions of July 2025 and February 2026; (ii) heritage impact, specifically the visual impact on the Parish Church of St Mary the Virgin at Fairstead and Beauchamps House, with a request for lines to be buried; (iii) environmental concerns regarding Galley Cable Wood and Troys Spring, which are noted wildlife sites, and impacts on ground-nesting birds and other species; (iv) landscape concerns including the compounding of existing 400kV line impacts; (v) significant reduction of agricultural workability and the potential impact on commercial shooting operations, including two principal drives which may become unviable; (vi) concerns regarding non-compliance with the Holford Rules; (vii) the proposed access roads causing severe agricultural and soil compaction impacts; (viii) the preferred connection method being offshore or underground; and (ix) interaction with the approved DCO for Longfield Solar Farm and the need for early engagement between National Grid, Longfield Solar Farm, and the Estate. Land Rights Sought The Applicant understands that this Affected Person's ("AP") objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
hampering meaningful review and causing significant time and stress. Key Concerns and Harm Caused by the Project Heritage - Significant visual impact on the Parish Church of St Mary the Virgin at Fairstead and Beauchamps House. To avoid detracting from the rural setting, we request the lines be buried. Environment, Habitat, and Species - The project passes near Galley Cable Wood and Troys Spring, which are important wildlife sites. Ground-nesting birds and other species will be affected. Landscape - The project will compound landscape impacts caused by existing 400kV lines. The alignment should, where possible, follow the route of existing lines to minimise new impacts. Proximity to Business - Agricultural workability of fields will be significantly reduced. Sporting rights (shooting operations) will also be severely affected. Breaches of Holford Rules - We have concerns regarding design and routing in relation to Holford Rules, particularly regarding landscape sensitivity. Access Roads - Proposed access roads will have a severe impact on agricultural output and soil compaction.	Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agents, Fisher German, have held regular engagement with the AP's representative. Head of Terms Version 2 were issued on 2nd April 2026. Engagement has been held with the Applicant and its engineers regarding accommodation changes to review the design, including the agreed removal of a portion of the purchase area, subject to a covenant over the land in question along with confirmation that a drainage point is not possible. This position has been fed back to the AP's agent, who is due to confirm regarding the covenant and preferred locations for drainage, for the engineers to review. The Applicant acknowledges the Affected Person's concerns regarding the interaction between the Project and the consented Longfield Solar Farm development, together with the potential effects on the Estate's commercial shooting operations. The Applicant is aware of the need to coordinate with other infrastructure schemes where interfaces arise and continues to engage with relevant parties to understand and manage any potential conflicts between the projects. In relation to shooting operations, the Applicant recognises the importance of these activities to the Estate and, where reasonably practicable, will seek to minimise disruption through ongoing engagement regarding construction planning, access arrangements and programming of works. The Applicant notes that the rights sought do not prevent the continued use of the land for agricultural or sporting purposes except where temporary restrictions may be required for safety or construction activities. Any losses arising from the exercise of DCO powers would be considered in accordance with the statutory compensation code. Furthermore, the Applicant remains willing to discuss the specific access route proposals identified by the Estate to understand whether refinements can be accommodated whilst continuing to meet the Project's operational and safety requirements. In relation to the AP's environmental concerns, the Applicant notes that there would be no direct impacts to Galley Cable Wood or Troys Spring Local Wildlife Sites (LWSs) or the specific species that they support. At the closest point Troys Wood is 140 m south of the Order Limits and Galley Cable Wood is 140 m southeast of the Order Limits. The Project would have no indirect effects on the flora and fauna that these LWSs support.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Connection Method - The connection should be either under the sea or underground to minimise surface impacts. Impact on Farming and Shooting Operations The Estate operates a commercial shoot, with two principal drives likely to be affected, potentially making them unviable. National Grid should coordinate with the Estate to avoid shooting seasons during construction and minimise impacts on farming operations. Failure to do so will likely result in financial losses and potential compensation claims. Solar DCO Interaction The land is subject to an approved DCO for Longfield Solar Farm. There are existing third-party rights. Early engagement between National Grid, Longfield Solar Farm, and the Estate is critical to minimise development conflicts. Access Routes Plan 5111-1: Permanent access should follow the existing track along the field edge, not cut into the field. Plan 5111-2: Permanent access should follow the existing track along the field edge, not cut into the field. Environmental and Landscape Considerations The development will result in landscape, environmental, and heritage impacts. This	Breeding bird surveys were conducted to inform the impact assessment as detailed in 6.8.A7 ES Appendix 8.7: Breeding Bird Report [Revision C] and 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]. This assessment included ground nesting birds, as well as other bird species. Skylark (<i>Alauda arvensis</i>) was the most common ground nesting species recorded during surveys. Based on the breeding bird assemblages present, the value of the Order Limits for breeding birds was assessed as Low to Medium. Habitat loss and disturbance effects on breeding birds were considered within the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]. Mitigation will be applied for breeding birds including avoiding vegetation clearance during the breeding season where possible, pre-work nesting bird checks, stand-off zones from nesting sites and the reinstatement of habitat post-works. Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significant residual effect on breeding birds. The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting of infrastructure, including consideration of the Holford Rules. The Applicant notes that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. The Applicant responded to the AP's submission in the 5.1 Consultation Report [Revision B]. In relation to the Holford Rules, the alignment of the overhead line has been developed following an extensive, multistage routeing and siting process, informed by environmental assessment, engineering constraints, land use considerations and consultation feedback. The Holford Rules were applied throughout this process as part of a balanced assessment rather than as absolute requirements. Compliance with individual Holford Rules can present conflicts, and routeing decisions require judgement to balance landscape, heritage, ecological, technical and deliverability considerations. The Applicant therefore does not agree that the Holford Rules have been breached in this location. The way the Holford Rules informed the routeing of the Project is set out in the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356], the Design Development Reports published during consultation [APP-358 to APP-360], and the Design Development Report submitted with the application for development consent (5.15 Design Development Report [APP-122]).

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representation aims to ensure impacts are minimised and appropriately mitigated. Final Note The cumulative burden of the consultation process, poor engagement, and the proposed impacts on the Estate's operations and environment is substantial. We request that these concerns be fully taken into account during the examination.	The Applicant acknowledges the concerns raised regarding the potential effects of the Project near White Notley, when seen in context with an existing 400kV overhead line. Existing overhead lines were considered as part of the landscape and visual baseline, against which the effects of the Project were assessed, as set out in Section 13.5 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]. The landscape near White Notley and Fairstead is located within Visual Receptor Areas (VRA) E5 (Black Notley and White Notley) and E6 (Terling and Witham). Significant adverse effects are identified for these receptors within approximately 1.5 km of the Project. Within Landscape Character Area (LCA) B1 Central Essex Farmlands, which encompasses the landscape between White Notley and Chatham Green to the south-west, significant effects on the landscape character at operation and construction are identified. The assessment notes in paragraphs 13.3.654 to 13.3.667 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B] that <i>'in the longer term, proposed planting within the Environmental Area around Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds would reduce effects' and 'undergrounding of short sections of existing overhead lines would help to reduce cumulative 'wirescape' effects within a localised area'</i>. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the

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Applicant's Response

land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e.

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Applicant's Response

affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-**

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

138]). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

The Applicant notes concerns raised by certain APs regarding the nature of permanent access rights sought by the Applicant. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and

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Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant notes concerns raised by certain APs regarding the potential for construction activities associated with the Project to cause damage to agricultural and other land. Although not directly related to the Applicant's request for authorisation of CA and TP powers, the Applicant's approach to soil handling is set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan **[Revision D]**. This is based on published good practice and is designed to enable soils which have been handled and stockpiled to be reinstated to return land to its preconstruction condition. This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

The Applicant has already addressed the comment concerning St Mary's Parish Church, Fairstead (NHLE 1337780, listed grade II*) and its assessment. The Applicant has reviewed the assessment of St Mary's Parish Church, Fairstead. The assessment has been informed by site visits, aerial and street-view imagery and viewpoint assessment (Figure 7.12.F143_VP5.08 Viewpoint 5.08: Fairstead Hall Road, Fairstead; document reference 7.12). The Applicant acknowledges that in some cases views across neighbouring parishes and intervisibility between churches can have deep historic roots and be an important element when assessing the setting of a heritage asset. The relationship between the parishes of Fairstead and White Notley to the north have been reviewed and the respective

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

parish churches are not visible until the outskirts of each settlement is reached. This is due to the rolling topography of the intervening landscape and screening by mature tree lined hedgerows, copses and tree belts. In the case of St Mary's Parish Church, it is therefore considered appropriate in this instance to describe the extent of its setting in terms of its parish boundary. Consequently, the Applicant considers the assessment undertaken within 6.11.A1 Environmental Statement Appendix 6.11.A1 - Historic Environment Baseline Report **[Revision C]** is appropriate. As for Beauchamps House (NHLE 1123454) listed building, its assessment has also been informed by site visits, aerial and street-view imagery. The closest pylon would be c. 700m north from the asset and the Applicant has concluded that the intervisibility between the asset and Order Limits is likely to be largely restricted by established surrounding trees and hedges and undulating topography, therefore, the setting of this asset does not extend to the Order Limits.

182. AP 182 - Alan Bruce Marshall

182.1 Person with Interest in Land (PIL) Reference ID: 3513

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
My wife and I have been custodians and farmers of this land for over 45 years. Our land is all grade 1 BMV and should be kept as that. Defra say there is only 3% of this quality in the country. We feel that the nations food security should be taken more into account. The planning act (2008) clearly states that the land requirement must prove there is no alternative especially where grade 1 land is involved. We have seen no proof and have been asking since the first consultation. We have turned down offers from a quarry company as we overly 12m of sand and ballast including silica sand. We have turned down an application for building. This is how strongly we feel! We have looked after it, to the best of our ability, without any doubt for the future and being able to pass it on to our children. They are now of the age they should be discussing their views for the future of our farm but this has now been put on hold for probably 5+years during the proposed construction and we don’t know what devastation we will be left with afterwards! We are a small farm of 78 acres of which the proposed project is claiming 64 acres leaving	Summary of Objection The AP's objection can be summarised as follows: (i) concern about the impact on Grade 1 Best and Most Versatile ("BMV") farmland, of which this AP holds approximately 78 acres, noting that only approximately 3% of such land exists nationally; (ii) the disproportionate extent of land take, with 64 of 78 acres proposed to be affected, leaving only 11 acres; (iii) the impact on wildlife habitats, including ancient hedgerows; (iv) the assertion that the rights sought are wider than necessary and that constructive feedback has been ignored; (v) that the Applicant has not demonstrated consideration of alternatives; (vi) that the Heads of Terms offered are unfair and contain unreasonable restrictions; and (vii) concerns about the adequacy of consultation and engagement. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German, has met with the AP's agent on numerous occasions to negotiate the HoTs, most recently at a meeting held on 4th June 2026. There

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
us one 11acre field that we are going to struggle to get a contractor interested in servicing. Our fields are edged by ancient hedgerows which provide us our land security. These will apparently be devastated by the proposed project which will also affect the vast amount of wildlife, that we have encouraged, that rely on such hedges. The rights being sought are far wider than necessary for the scheme and the applicant seems to have ignored any constructive feedback from ourselves and other landowners. The applicant has not demonstrated to us that they have considered any alternatives schemes. The applicant is asking for us to sign Heads of Terms that are unfair and contain unreasonable restrictions. The cash incentives look like a bribe to get us to sign but then find we are no longer able to comment on the scheme!	have not been any site-specific requests received by the Applicant's agents from the AP or their agent. Notwithstanding this, the Applicant remains committed to negotiating terms and will continue to engage on specific concerns with the AP for their holding. At the most recent Compulsory Acquisition Hearing 3 ("CAH3"), it was confirmed that the Applicant's request to undertake additional non-intrusive surveys over other land owned by the AP is solely to understand the wider environment and the Applicant is not looking to use this land in any form for the Project. In relation to the AP's concerns about ecological impacts, the Applicant can confirm the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have Inform the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Outline Code of Construction Practice [Revision G] contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. For example, where it is necessary to remove hedgerows and trees, replacement planting would be provided. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including

Please summarise (in no more than 1500 words) the reason(s) for your objection

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farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition.

Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]** confirms the amount of agricultural land to be permanently impacted.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

183. AP 183 - EDF Energy Renewables Ltd

183.1 Person with Interest in Land (PIL) Reference ID: 15477

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that	Summary of Objection The AP's objection can be summarised as follows: (i) a contention that the Applicant has failed to demonstrate that all reasonable alternatives to compulsory acquisition have been explored as required by Paragraph 8 of the MHCLG Guidance (September 2013), principally because negotiations are at an early stage and alternative designs or routes have not been properly considered; (ii) a contention that the Applicant has not made adequate attempts to acquire land and rights by agreement before seeking CA powers, contrary to Paragraph 25 of the Guidance; (iii) a contention that the impacts of the proposed scheme on EDF Energy Renewables' infrastructure have not been adequately considered and that the Applicant has not engaged sufficiently to understand the nature and extent of those impacts; and (iv) an assertion that many impacts might have been avoided or substantially mitigated through earlier and more meaningful private treaty discussions, and that the statutory conditions under Section 122 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold, Occupation, Easement Right or Privilege, Option to Purchase, and Restrictive Covenants within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3

Please summarise (in no more than 1500 words) the reason(s) for your objection

authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition.

The impacts of the proposed scheme on EDF Energy Renewable's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on EDF Energy Renewable's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development.

In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually

Applicant's Response

(underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest.

Consolidated Response

Version 2 Heads of Terms were issued on 9th April 2026.

In relation to the specific interaction of the Project with the AP's infrastructure, the overhead line has been carefully routed to avoid any pylons being within the consented panel area, with interaction limited to a section of oversail where interaction will be minimal. Avoidance of the limited oversail is restricted by the presence of residential properties to the west, with localised alternatives slightly further west also less preferred because of increased effects to multiple residential properties.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

184. AP 184 - Pivoted Power LLP

184.1 Person with Interest in Land (PIL) Reference ID: 20342

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicants should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that	Summary of Objection The AP's objection can be summarised as follows: (i) a contention that the Applicant has failed to demonstrate that all reasonable alternatives to compulsory acquisition have been explored as required by the MHCLG Guidance (September 2013), principally because negotiations are at an early stage and alternative designs or routes have not been properly considered; (ii) a contention that the Applicant has not made adequate attempts to acquire land and rights by agreement before seeking CA powers; (iii) a contention that the impacts of the proposed scheme on Pivoted Power LLP's infrastructure have not been adequately considered and that the Applicant has not engaged sufficiently to understand the nature and extent of those impacts; and (iv) an assertion that many impacts might have been avoided or substantially mitigated through earlier and more meaningful private treaty discussions, and that the statutory conditions under Section 122 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that Pivoted Power LLP holds interests in land within the Project Order Limits by way of leasehold, occupation and easement right, arising pursuant to a Deed of Grant dated 18 July 2025 by which the Applicant, as freehold owner, granted Pivoted Power LLP the rights necessary for the installation and operation of an underground electricity cable. The Applicant understands the cable has been fully installed. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition.

The impacts of the proposed scheme on Pivoted Power LLP's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Pivoted Power LLP's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development.

In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually

Applicant's Response

is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

In relation to the specific interaction of the Project with Pivoted Power LLP's infrastructure, the works to be undertaken by the Applicant close to the cable are limited and only partially overlap with the cable. The use of the haul road during the construction and maintenance period of the Project is necessary but can be managed effectively. The Applicant has also identified that Biodiversity Net Gain (BNG) land will need to be delivered on the site occupied by the Cable.. The Applicant's position is that this existing asset can be fully protected and any interference can be mitigated.

The Applicant confirms that it is in negotiations with Pivoted Power LLP to agree a side agreement which it understands will fully resolve their concerns.

Insofar as the AP has any overarching concerns about the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant sets out its full response here:

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

185. AP 185 - Ashgreen Energyfarm Limited

185.1 Person with Interest in Land (PIL) Reference ID: 15917

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that	Summary of Objection The AP's objection can be summarised as follows: (i) a contention that the Applicant has failed to demonstrate that all reasonable alternatives to compulsory acquisition have been explored, as required by the MHCLG Guidance (September 2013); (ii) a contention that the Applicant has not made adequate attempts to acquire land and rights by agreement before seeking CA powers; (iii) a contention that the impacts of the proposed scheme on Ashgreen Energyfarm Limited's infrastructure have not been adequately considered and that the Applicant has not engaged sufficiently to understand the nature and extent of those impacts; and (iv) an assertion that many impacts might have been avoided or substantially mitigated through earlier and more meaningful private treaty discussions, and that the statutory conditions under Section 122 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that Ashgreen Energyfarm Limited’s (Ashgreen) objection concerns land interests held as Leasehold and Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest.

Please summarise (in no more than 1500 words) the reason(s) for your objection

authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition. The impacts of the proposed scheme on Ashgreen Energyfarm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Ashgreen Energyfarm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development. In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst

Applicant's Response

Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

In relation to the specific interaction of the Project with Ashgreen's infrastructure, the works to be undertaken by the Applicant close to the cable are limited and only partially overlap with the cable. The use of the haul road during the construction and maintenance period of the Project is necessary but can be managed effectively. The Applicant has also identified that Biodiversity Net Gain (BNG) land will need to be delivered on the site occupied by the cable. The Applicant's position is that this existing asset can be fully protected and any interference can be mitigated. but must be crossed. The Applicant confirms that it is in negotiations with Ashgreen to agree a side agreement which it understands will fully resolve their concerns.

Insofar as the AP has any overarching concerns about the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant sets out its full response here:

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

186. AP 186 - W Bradshaw & Son C/o David William Bradshaw

186.1 Person with Interest in Land (PIL) Reference ID: 7196

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The Consultations have been defective - see Legal Opinion of Lord Charles Banner QC submitted by Essex Suffolk Norfolk campaign group who found numerous legal deficiencies in National Grid's approach to the consultations arguing it falls well short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination.	Summary of Objection The AP's objection can be summarised as follows: a contention that the Applicant's pre-application consultations have been defective, as set out in the Legal Opinion of Lord Charles Banner KC submitted by the Essex Suffolk Norfolk campaign group, which identified numerous alleged legal deficiencies in National Grid's approach to consultation, arguing that it fell well short of adequate pre-application consultation sufficient to enable a Development Consent Order application to proceed to examination. The Applicant's land agents at Fisher German have met with the AP's representative on multiple occasions to negotiate and progress the HoTs, most recently at a meeting held on 4th June 2026. Revised Terms will be issued in due course and the Applicant continues to engage with the AP's agent. No specific requests for accommodation works have been received by the Applicant; however, the revised terms will include a reduced land plan as per the Applicant's current directive. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Consolidated Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

187. AP 187 - Longfield Solar Energy Farm Limited

187.1 Person with Interest in Land (PIL) Reference ID: 25194

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that	Summary of Objection The AP's objection can be summarised as follows: (i) a contention that the Applicant has failed to demonstrate that all reasonable alternatives to compulsory acquisition have been explored, as required by the MHCLG Guidance (September 2013); (ii) a contention that the Applicant has not made adequate attempts to acquire land and rights by agreement before seeking CA powers; (iii) a contention that the impacts of the proposed scheme on Longfield Solar Energy Farm Limited's infrastructure have not been adequately considered and that the Applicant has not engaged sufficiently to understand the nature and extent of those impacts; and (iv) an assertion that many impacts might have been avoided or substantially mitigated through earlier and more meaningful private treaty discussions, and that the statutory conditions under Section 122 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Easement Right or Privilege and Restrictive Covenants within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

authority to acquire land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition.

The impacts of the proposed scheme on Longfield Solar Energy Farm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on Longfield Solar Energy Farm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development.

In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private

Applicant's Response

In relation to the specific interaction of the Project with the AP's infrastructure, there is minimal interaction with the Longfield Solar Farm except for the use of a permanent access route (which is shared by both parties) to access an existing 132 kV tower for modification works and the deconstruction of a 132 kV Mit Tower which falls within the Applicant's Order Limits but which also falls within an area required for the AP to deliver BNG land. The use of the access route is temporary in nature and the Applicant confirms it will cease to be required once the modification works are complete. The Applicant confirms that it is in negotiations with the AP to agree a side agreement which it understands will fully resolve their concerns.

Insofar as the AP has any overarching concerns about the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant sets out its full response here:

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
treaty negotiations, it is likely that mutually acceptable arrangements could have been reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

188. AP 188 - DamsonGreen Energyfarm Limited

188.1 Person with Interest in Land (PIL) Reference ID: 29271

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Paragraph 8 of the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (September 2013) ("the Guidance") provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The Guidance further states that the applicant will need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate. The Applicant has failed to demonstrate that all reasonable alternatives have been explored, as required by the Guidance, principally because negotiations are at a very early stage and alternative designs or routes have not been properly considered. The Applicant has not made adequate attempts to acquire the land and rights by agreement before seeking compulsory acquisition powers, contrary to the expectation set out in paragraph 25 of the Guidance that authority to acquire	Summary of Objection The AP's objection can be summarised as follows: (i) a contention that the Applicant has failed to demonstrate that all reasonable alternatives to compulsory acquisition have been explored, as required by the MHCLG Guidance (September 2013); (ii) a contention that the Applicant has not made adequate attempts to acquire land and rights by agreement before seeking CA powers; (iii) a contention that the impacts of the proposed scheme on DamsonGreen Energyfarm Limited's infrastructure have not been adequately considered and that the Applicant has not engaged sufficiently to understand the nature and extent of those impacts; and (iv) an assertion that many impacts might have been avoided or substantially mitigated through earlier and more meaningful private treaty discussions, and that the statutory conditions under Section 122 of the Planning Act 2008 are not met. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Restrictive Covenants and Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds a Category 2 interest (Class 1 – Compulsory Acquisition of Land). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary agreement with each individual Category 2 interest. Whilst Heads of Terms are not

Please summarise (in no more than 1500 words) the reason(s) for your objection

land compulsorily should only be sought if attempts to acquire by agreement fail. Agreement has not yet been reached, and the Applicant has not afforded our client a proper opportunity to negotiate terms that could avoid the need for compulsory acquisition.

The impacts of the proposed scheme on DamsonGreen Energyfarm Limited's infrastructure have not been adequately considered by the Applicant. The Applicant has not engaged sufficiently to understand the nature and extent of the impact on DamsonGreen Energyfarm Limited's infrastructure, nor has it properly assessed the consequences that the proposed compulsory acquisition would have upon the operation and maintenance of that infrastructure. Without adequate engagement, the Applicant cannot demonstrate to the satisfaction of the Secretary of State that the interference the land and rights is proportionate, or that the land to be acquired is no more than is reasonably required for the purposes of the development.

In conclusion, many of the impacts of the proposed scheme on its land and infrastructure might be avoided, or substantially mitigated, if private treaty discussions had been advanced at an earlier stage and in a more meaningful manner. Had the Applicant engaged constructively with our client through private treaty negotiations, it is likely that mutually acceptable arrangements could have been

Applicant's Response

generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

Consolidated Response

In relation to the specific interaction of the Project with the AP's infrastructure, there is minimal interaction with the AP except for the temporary use of a haul road for access to a construction compound at Bramford Substation over the AP's buried cable. The Applicant confirms that it is in negotiations with the AP to agree a side agreement which it understands will fully resolve their concerns. Insofar as the AP has any overarching concerns about the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant sets out its full response here:

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
reached that would protect our client's infrastructure whilst accommodating the requirements of the scheme. The Applicant's failure to pursue this course means that it has not discharged the burden of demonstrating that compulsory acquisition is necessary and proportionate, and the Secretary of State cannot be satisfied that the conditions in section 122 of the Planning Act 2008 are met. We will continue to engage in negotiations with the Applicant and will update the Examining Authority on the status of negotiations as they progress.	TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

189. AP 189 - Mrs Jayne Bridget Marshall

189.1 Person with Interest in Land (PIL) Reference ID: 5883

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Our family run farm has provided us with a steady income, security and a much loved home in a rural environment that we have managed and cared for with dedication for +40 years. Our home is our safe place and where we work, rest and enjoy time with family and friends. The thought of losing this is upsetting and a constant worry, to say the least! It belongs to us! Our plans for our children to take over the farm in future years will offer no incentive for them to do so if pylons, overhead high voltage cables and underground HVAC cabling are to blight our land and take over the area as they currently know it. All our land is of finest quality Grade 1 BMV soil (approximately only 3% nationwide), which enables high volumes of good quality staple diet crops (eg wheat, barley, potatoes, sugarbeet) to be grown on it. Maintaining sustainable returns for us, whilst contributing also to our country’s all important food chain (National Food Security) is of massive importance to us. During the proposed construction period, our 45 year old bramley apple orchard would be affected by	Summary of Objection The AP's objection can be summarised as follows: (i) deep personal concern about the impact on a family-run farm which has been operated for over 40 years, noting that all land is Grade 1 BMV soil (approximately only 3% of such land exists nationally) and supports high-volume staple crop production; (ii) concern about impacts during construction on a 45-year-old Bramley apple orchard through dust, surface contamination and crop loss; (iii) concern that land structure will not recover and opposition to the use of any soil stabilisation materials; (iv) concern about security following proposed removal of ancient hedgerows (some with tree preservation orders); (v) the assertion that the proposals contradict Section 122 of the Planning Act 2008, as National Grid has not demonstrated it has explored all alternatives; (vi) the assertion that National Grid's consultations have been defective, that there are fundamental errors in the DCO, and that survey results have not been shared with the AP despite numerous requests; and (vii) concern about additional survey requests over land outside the Order Limits. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection

dust, resulting in smaller fruit size, surface contamination and a crop not fit for sale. Our land structure will never recover! We are totally opposed to the use of any soil stabilization materials, as has been suggested! Our property will be open and vulnerable to trespassing and fly tipping if our ancient hedgerows are ripped out (some with tree preservation orders in place). These provide much natural security. Insurance premiums are likely to increase (extra cost to us) if security is compromised. National grid's (NG) proposals to upgrade its grid system (Norwich to Tilbury) now threaten everything we, as a family have worked hard for, and just the thought of what's planned is indescribably sickening! The proposals contradict the Planning Act of 2008 (section 122) and where it states that applicants (in this case, National Grid) must demonstrate that they have explored all other alternatives to ensure compulsory acquisition is a last resort and kept to the absolute minimum. To date, National Grid has failed to provide us with any alternative options, failed to answer questions and many of its representatives are often arrogant and dismissive. National Grid's consultations have been defective throughout, there are fundamental errors in the DCO and as an example, we are still waiting for results from all survey works carried out on our land thus far, despite having asked on numerous occasions. Where are these results? Most of our land will

Applicant's Response

(Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant's land agent, Fisher German has met with the AP's agent on numerous occasions, most recently on 4th June 2026. These discussions remain ongoing and the Applicant remains committed to reaching a voluntary agreement with the AP. There have been no specific requests from the AP via their agent to date. At the most recent CAH3, it was confirmed that the Applicant's request to undertake additional non-intrusive surveys over other land owned by the AP is solely to understand the wider environment, and the Applicant is not looking to use this land in any form for the Project.

During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 -Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner.

Please summarise (in no more than 1500 words) the reason(s) for your objection

be ruined beyond repair (3 pylons and 200 meter swathes for HVAC underground cabling) if this project is granted planning consent. One remaining field (so we thought) of 11 acres will be difficult to manage efficiently and cost effectively. We have, in the last few days, been informed by our land agent that Fisher German (on behalf of NG) now want to survey this field also, which is outside of the order limit. Why is it that NG seems to be doing just as it pleases? I question why changes to an already submitted DCO application should be permitted, as has been the case on numerous occasions? It's undemocratic, unfair and unacceptable! Our entire land/property will be devalued! Relocation is not an option! You cannot move a farm and we also have another business on site. Compulsory acquisition is not in the interest of the public when alternative methods of upgrading the system haven't been considered. We have, in the past, rejected offers from housing developers to purchase some of our land. We know we have at least 12 meters of sand and ballast beneath our fine topsoil, yet we've declined the opportunity to excavate; for the simple reason that Farmland is For Food! We will still be expected to pay our annual land drainage charge to the Environment Agency, as will most of the affected landowners. This hasn't been mentioned! The Heads of Terms are unreasonable and should be considered bribery! A case of 'signing prior to a DCO

Applicant's Response

This includes aspects of preparing the subsoil which has become compacted prior to placement of topsoil. This plan also confirms that topsoil and subsoil should be stockpiled on like for like (i.e. topsoil can be stored on topsoil). This will limit the potential for subsoil or clay migration into topsoil resources. It also includes the potential use of soil stabilisation only in subsoil (i.e. topsoil would not be treated) where it would result in no materially different effects and any use would be developed by the Soil Scientist to ensure there was an appropriate testing schedule to confirm the suitability prior to implementation. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including damage caused by the works) assessed on a case-by-case basis.

Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]** confirms the amount of agricultural land to be permanently impacted.

An assessment has been undertaken in relation to health and wellbeing, with the findings presented in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing **[Revision C]**. The assessment notes the potential impact of the Project on the mental health and wellbeing on local residents as a result of factors such as uncertainty and potential impacts of construction activities. The Applicant has committed to the preparation of a detailed Communications Strategy as part of 7.2 Outline Code of Construction Practice **[Revision G]** which will set out the approach to community liaison.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large

Please summarise (in no more than 1500 words) the reason(s) for your objection

being consented and receive an early-signing incentive payment' (up to 20% land fights value), or forfeit this by refusing. By signing, we will be unable to make further comments about the proposal (in other words.....Sign up and shut up). These are bully-boy tactics! The applicant (NG) hasn't demonstrated that interference is necessary, proportionate or limited to what is reasonably required. We feel we can't plan for the future, invest in solar panels for a new barn we built, erect new fencing, plant a foraging woodland (as we had hoped to do) or invest in new equipment. In conclusion: Our farm is our life! We ALL need food, and in order to provide it, we must protect the land upon which it grows!

Applicant's Response

groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment. In response, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report - including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. Where potential effects on the environment have been anticipated mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice **[Revision G]**, 7.3 Outline Construction Traffic Management Plan **[Revision F]**, 7.4 Outline Landscape and Ecological Management Plan **[Revision G]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation **[Revision C]** and Outline Public Rights of Way Management Plan **[Revision D]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report **[APP-066]** and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions **[REP1-007]**.

A number of APs have restated general concerns as to the potential impact of the Project on existing agricultural operations. It is not disputed that, during construction of the Project,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

there may be a period of time where access to agricultural land is reduced due to construction corridor re-fencing and health and safety management associated with the construction apparatus. However, regular information regarding project programme will be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effects of the project during construction, including temporary severance of land. The Applicant will not be able to settle the precise mitigation measures with the affected persons until the detailed design stage of the project where the more detailed construction methodology, land areas and timescales are known. The Applicant will endeavour to facilitate crossing points with suitable fencing and gates to ensure parts of the field will remain available for use for appropriate agricultural machinery. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are directly attributable to the Project (including severance of land) assessed on a case-by-case basis.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routing options. Those subsea routing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

190. AP 190 - Cullum Agri Ltd

190.1 Person with Interest in Land (PIL) Reference ID: 5577

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This submission is made on behalf of T A Cullum and is based upon the detailed written representations submitted at Deadline 4 for CAH2. This Landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required or feasible, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and may outweigh any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in	Summary of Objection The AP's objection can be summarised as follows: (i) the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance; (ii) under Section 122, the land take is considered excessive with areas beyond what is required, and reasonable alternatives including route changes or undergrounding have not been properly explored; (iii) key technical matters remain unresolved, and harm to the farming business is significant; (iv) under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas; (v) the Applicant has not complied with the 2013 Guidance, with no agreed HoTs, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence; (vi) the proposals would result in long-term and permanent agricultural land loss and operational disruption. The AP notes that a meeting was arranged with the Applicant and their agent on 19th June 2026 to progress ongoing negotiations regarding the HoTs, and while not objecting to the scheme in principle, considers CA premature and unjustified at this stage. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an

Please summarise (in no more than 1500 words) the reason(s) for your objection

relation to access, easements, and working areas, and are supported by incomplete and fragmented information.

The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort.

Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated.

By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms.

To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.

Applicant's Response

interest: Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

The Applicant has provided further detail ref 2.1 in **8.31 Response to Rule 17 letter Received 14th July 2026** which signposts to the detail in the Deadline 6 submissions of these Affected Parties in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6**, including engagement history.

The Applicants Land Agent, Fisher German has been engaging with HoTs negotiations with the AP and their agent, with both on and off site meetings held during 2026, the most recent of which was 19th June 2026. . An upcoming meeting is confirmed with the AP's agent on 22nd July 2026 to continue discussions regarding HoTs. The discussions revolve around siting of pylons and mitigations to the agricultural business during and post construction.

In relation to agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. The Applicant also refers to the detailed responses contained in 8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

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Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routing options. Those subsea routing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

191. AP 191 - T A Cullum Contracting Ltd

191.1 Person with Interest in Land (PIL) Reference ID: 24776

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweighs any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas, and are supported by incomplete and fragmented information.	Summary of Objection The AP's objection can be summarised as follows: (i) the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance; (ii) under Section 122, the land take is considered excessive with areas beyond what is required, and reasonable alternatives including route changes or undergrounding have not been properly explored; (iii) key technical matters remain unresolved, and harm to the farming business is significant; (iv) under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas; (v) the Applicant has not complied with the 2013 Guidance, with no agreed HoTs, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence; (vi) the proposals would result in long-term and permanent agricultural land loss and operational disruption. The AP notes that a meeting was arranged with the Applicant and their agent on 19th June 2026 to progress ongoing negotiations regarding the HoTs, and while not objecting to the scheme in principle, considers CA premature and unjustified at this stage. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an

Please summarise (in no more than 1500 words) the reason(s) for your objection

The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated.

By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms.

To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.

Applicant's Response

interest: Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

The Applicant has provided further detail ref 2.1 in **8.31 Response to Rule 17 letter Received 14th July 2026** which signposts to the detail in the Deadline 6 submissions of these Affected Parties in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6**, including engagement history.

The Applicants Land Agent, Fisher German has been engaging with HoTs negotiations with the AP and their agent, with both on and off site meetings held during 2026, the most recent of which was 19th June 2026. . An upcoming meeting is confirmed with the AP's agent on 22nd July 2026 to continue discussions regarding HoTs. The discussions revolve around siting of pylons and mitigations to the agricultural business during and post construction.

In relation to agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. The Applicant also refers to the detailed responses contained in 8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**, the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land"

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

(MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routing options. Those subsea routing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

192. AP 192 - Norwich Diocesan Board of Finance Limited

192.1 Person with Interest in Land (PIL) Reference ID: 10177

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This submission is made on behalf of the Norwich Diocesan Board of Finance Limited and is based upon the detailed Written Representation submitted at Deadline 4 for CAH2. Our client objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweigh any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in	Summary of Objection The AP's objection, based on detailed written representations submitted at Deadline 4 for CAH2, can be summarised as follows: (i) the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance; (ii) under Section 122, the land take is considered excessive, with areas beyond what is required included and reasonable alternatives including route changes or undergrounding not properly explored; (iii) key technical matters remain unresolved, and harm to the farming business is significant and outweighs any benefits; (iv) under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas; (v) the Applicant has not complied with the 2013 Guidance, with no agreed HoTs, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence; (vi) the Applicant has failed to properly address occupier interests where land is subject to agricultural tenancies, and it is inappropriate to expect the landowner to negotiate on the Applicant's behalf; and (vii) the proposals would result in long-term and permanent agricultural land loss and operational disruption. The AP notes that a meeting was arranged with the Applicant and their agent on 19th June 2026 to progress ongoing HoT negotiations, and while not objecting to the scheme in principle, the AP considers CA premature and unjustified at this stage. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold, Occupation, Restrictive Covenants, and Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
relation to access, easements, and working areas, and are supported by incomplete and fragmented information. The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort. The Applicant has further failed to properly address occupier interests, where land is subject to agricultural tenancies. It is inappropriate to expect the landowner to negotiate on the Applicant's behalf, and this omission creates additional uncertainty, contrary to the Guidance requirement to identify and address all land interests. Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated. By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms. To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.	underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response Fisher German has been engaged in HoTs negotiations with the AP and their agent, including meetings with the agent to engage with the AP regarding practical matters associated with the Project, including discussions regarding mitigation and accommodation of works. The AP's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 19th June 2026. An upcoming meeting is confirmed with the AP's agent on 22nd July 2026 to continue discussions regarding HoTs. In relation to agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition.

In relation to the AP's concern regarding occupier interests and agricultural tenancies, the Applicant's engagement strategy encompasses both freeholders and those with occupier interests, and the Applicant will continue to engage with all relevant parties.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

193. AP 193 - D N Grady & Sons Ltd

193.1 Person with Interest in Land (PIL) Reference ID: 10516

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This submission is made on behalf of D N Grady Ltd and is based upon the detailed written representations submitted at Deadline 4 for CAH2. The landowner objects to the proposed compulsory acquisition (CA) on the basis that the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance. Under Section 122, the Applicant has failed to demonstrate that the land and rights are necessary or justified. The land take is considered excessive, with inclusion of areas beyond what is required, and reasonable alternatives, such as route changes or undergrounding, have not been properly explored. In addition, key technical matters remain unresolved, meaning the full impacts cannot be understood, while harm to the farming business is significant and outweighs any benefits. Under Section 123, the proposals lack sufficient clarity and definition, particularly in	Summary of Objection The AP's objection, based on detailed written representations submitted at Deadline 4 for CAH2, can be summarised as follows: (i) the Applicant has not met the statutory tests under Sections 122 and 123 of the Planning Act 2008, nor followed the 2013 DCLG Guidance; (ii) under Section 122, the land take is considered excessive, with areas beyond what is required included and reasonable alternatives including route changes or undergrounding not properly explored; (iii) key technical matters remain unresolved, and harm to the farming business is significant and outweighs any benefits; (iv) under Section 123, the proposals lack sufficient clarity and definition, particularly in relation to access, easements, and working areas; (v) the Applicant has not complied with the 2013 Guidance, with no agreed HoTs, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence; (vi) the Applicant has further failed to properly address occupier interests where the land is subject to agricultural tenancy; and (vii) the proposals would result in long-term and permanent agricultural land loss and operational disruption. The AP notes that a meeting was arranged with the Applicant and their agent on 19th June 2026 to progress ongoing HoT negotiations, and while not objecting to the scheme in principle, the AP considers CA premature and unjustified at this stage. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), Class 4 (overhead line and underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in

Please summarise (in no more than 1500 words) the reason(s) for your objection

relation to access, easements, and working areas, and are supported by incomplete and fragmented information.

The Applicant has also not complied with the 2013 Guidance, with no agreed Heads of Terms, inconsistent engagement, limited effort to minimise land take, and inadequate supporting evidence. Compulsory acquisition has not been demonstrated to be a last resort.

The Applicant has further failed to properly address the occupier interests, where the land is subject to agricultural tenancy. It is inappropriate to expect the landowner to negotiate on the Applicant's behalf, and this omission creates additional uncertainty, contrary to the Guidance requirement to identify and address all land interests Overall, the proposals would result in long term and permanent agricultural land loss, operational disruption, and long-term business impacts, which have not been adequately mitigated.

By way of an update a meeting has been arranged with the Applicant and their agent on 19 June to progress ongoing negotiations regarding the Heads of Terms.

To conclude while not objecting to the scheme in principle, the landowner considers compulsory acquisition premature and unjustified, and therefore objects to the exercise of CA powers at this stage.

Applicant's Response

which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest.

Consolidated Response The Applicant has provided further detail ref 2.1 in **8.31 Response to Rule 17 letter Received 14th July 2026** which signposts to the detail in the Deadline 6 submissions of these Affected Parties in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6**.

The Applicants land agent, Fisher German has been engaged in HoTs negotiations with the AP and their agent, including meetings on-site to engage with the AP regarding practical matters associated with the Project, including discussions regarding mitigation and accommodation of works. A meeting was held on 26th March 2026 on-site with the AP's agent present. The AP's agent attended the Norfolk agent meeting held, with both Fisher German and National Grid in attendance, on 19th June 2026. An upcoming meeting is confirmed with the AP's agent on 22nd July 2026 to continue discussions regarding HoTs.

In relation to agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan

[Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition.

In relation to the AP's concern regarding occupier interests and agricultural tenancies, the Applicant notes that its engagement strategy encompasses both freeholders and those with occupier interests, and the Applicant will continue to engage with all relevant parties accordingly.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Report **[APP-122]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

194. AP 194 - Katherine S Lee

194.1 Person with Interest in Land (PIL) Reference ID: 25468, 9410

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This submission is made on behalf of Katherine Lee and in her role as Personal Representative to the Estate of Michael Lee and is based upon the detailed Written Representation submitted at Deadline 4 for CAH2. The landowner is affected only by third-party utility works and objects to the interference with the land and rights on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013). Under Section 122, there is no compelling case, with insufficient clarity on third-party utility works, limited engagement, and failure to properly consider a less impactful alternative route. The land and rights sought have not been shown to be necessary or proportionate, and impacts on farming operations have not been minimised. Under Section 123, the proposals lack clarity and completeness, with uncertainty over land	Summary of Objection The APs objections can be summarised as follows: (i) the AP is affected only by third-party utility works and objects to the interference with the land and rights on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013); (ii) under Section 122, there is no compelling case, with insufficient clarity on third-party utility works, limited engagement, and failure to properly consider a less impactful alternative route; (iii) the land and rights sought have not been shown to be necessary or proportionate, and impacts on farming operations have not been minimised; (iv) under Section 123, the proposals lack clarity and completeness, with uncertainty over land take, temporary possession, construction activities, and reinstatement; (v) the Applicant has failed to treat CA as a last resort; (vi) the scheme would cause temporary land loss, disruption to farming, and long-term business impacts. By way of update, UKPN's agents have offered a meeting to discuss outstanding matters, however issues relating to coordination, routeing, and impacts remain unresolved. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure), (b) Class 4 (overhead line and underground cable infrastructure). Consolidated Response The Applicant has provided further detail ref 2.1 in 8.31 Response to Rule 17 letter Received 14th July 2026 which signposts to the detail in the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
take, temporary possession, construction activities, and reinstatement. Supporting information is fragmented and high-level, preventing proper assessment. The Applicant has also not complied with Guidance, having failed to treat compulsory acquisition as a last resort, properly consider alternatives, provide a robust evidence base, or minimise impacts. The scheme would cause temporary land loss, disruption to farming, and long-term business impacts, which have not been adequately mitigated and are therefore disproportionate. By way of an update UKPN's agents have now offered a meeting to discuss outstanding matters, however, issues relating to coordination, routeing, and impacts remain unresolved, and this does not overcome the fundamental deficiencies identified above. Overall, compulsory acquisition is premature and unjustified, as the scheme is not sufficiently defined, impacts remain unclear, and meaningful engagement has not taken place.	Deadline 6 submissions of this Affected Party in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6. The Applicant's land team at Fisher German has been engaged in HoTs negotiations with the AP and their agent, including meetings with the agent to engage with the AP regarding practical matters associated with the Project, including discussions regarding mitigation and accommodation of works. The AP's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 13th May 2026. The next upcoming meeting is confirmed for July 2026. In relation to agricultural impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition, or as agreed with the landowner. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

UK Power Networks have received confirmation that the AP is being represented by Savills. The AP has requested UK Power Networks consider a routing for the proposed 11kV cable which falls outside of the red line boundary for the DCO scheme. A review of whether the impacts of the proposed work on the AP can be further minimised is ongoing; however, the route proposed by the landowner is unachievable due to the routing being outside of the red line boundary. UK Power Networks have proposed dates for a further meeting with the AP's land agent. It should be noted that UK Power Networks will only utilise any compulsion powers granted by the DCO as a last resort, in the event voluntary agreement cannot be reached. UK Power Networks will seek to continue voluntary negotiations further to the end of the examination period and any subsequent grant of the DCO.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

195. AP 195 - 2 Agriculture Growing Limited

195.1 Person with Interest in Land (PIL) Reference ID: 15476

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This objection is submitted on behalf of 2 Agriculture Growing Ltd and is based on the detailed written representations provided at Deadline 4 for CAH2, which set out the landowner's concerns in full. Our client is affected by third-party utility works and objects on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013). Under Section 122, there is no compelling case, with insufficient clarity on third-party utility works, limited engagement, and failure to properly consider a less impactful alternative route. The land and rights sought have not been shown to be necessary or proportionate, and impacts on farming operations have not been minimised. There has been a failure to engage with the occupier's interests, as a tenant operating a poultry unit. The Applicant has not shown that the land and rights sought are necessary or proportionate, nor that reasonable steps have	Summary of Objection The AP's objection can be summarised as follows: (i) the AP is affected by third-party utility works and objects on the basis that the Applicant has failed to satisfy the statutory requirements of Sections 122 and 123 of the Planning Act 2008, and has not complied with the principles of the DCLG Guidance (September 2013); (ii) there has been a failure to engage with the occupier's interests as a tenant operating a poultry unit; (iii) the Applicant has not shown that the land and rights sought are necessary or proportionate, nor that reasonable steps have been taken to acquire them by agreement; (iv) the proposals lack clarity and completeness, particularly in relation to the rights sought and how occupiers' legal interests will be secured; (v) the Applicant has failed to comply with the 2013 Guidance, including not demonstrating CA as a last resort; and (vi) the scheme presents a risk of significant disruption to an operational poultry business. By way of update, UKPN's agents have offered a meeting to discuss outstanding matters, though issues relating to coordination, routing, and impacts remain unresolved. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Leasehold, Occupation, and Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of

Please summarise (in no more than 1500 words) the reason(s) for your objection

been taken to acquire them by agreement. The absence of engagement and clarity around occupier rights undermines the case that compulsory acquisition is justified.

The proposals lack clarity and completeness, particularly in relation to the rights sought and how occupiers' legal interests will be secured. There is no clear framework setting out how engagement will take place or what is expected of affected parties, leaving the tenant in a position of uncertainty and preventing meaningful negotiation.

The Applicant has also failed to comply with the 2013 Guidance, including not demonstrating compulsory acquisition as a last resort, by failing to engage meaningfully with our client.

The scheme presents a risk of significant disruption to an operational poultry business, with potential impacts not yet properly understood or addressed due to lack of engagement and clarity.

By way of an update UKPN's agents have now offered a meeting to discuss outstanding matters, however, issues relating to coordination, routeing, and impacts remain unresolved, and this does not overcome the fundamental deficiencies identified above.

Overall, compulsory acquisition is premature and unjustified, as the Applicant has not properly engaged with our client, has failed to demonstrate that all reasonable steps have

Applicant's Response

temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant's land team at Fisher German has been engaged in ongoing discussions with the agent regarding the AP. The impact on this AP is limited to UK Power Networks works (limits of deviation) and a highways visibility splay, for which Version 2 Heads of Terms has been issued. The Applicant will continue to work with the occupier regarding bio-security matters and any other relevant mitigation.

In relation to agricultural and bio-security impacts, during route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives **[Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement **[Revision B]**).

During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed, including discussions regarding specific biosecurity measures required. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils **[Revision B]**) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

Further to a review of the Book of Reference, UK Power Networks understands that the AP holds a Category 2 land interest in land parcels B-8/68 and B-9/8, which fall within the limits of deviation for proposed UK Power Networks low voltage cable diversion works. UK Power Networks notes that the AP has been engaged by the Applicant and its land agents, Fisher

Please summarise (in no more than 1500 words) the reason(s) for your objection

been taken to secure agreement, and has not provided sufficient clarity on the rights sought or impacts of the scheme.

Applicant's Response

German, in relation to National Grid's proposed rights and land requirements. However, at this stage UK Power Networks does not consider that the full extent of the limits of deviation, and therefore the AP's identified land parcels, will be required for permanent UK Power Networks land rights. Consequently, UK Power Networks has not separately engaged with the AP regarding UK Power Networks-specific rights requirements and no Heads of Terms have been issued in respect of those rights. If ongoing detailed design work identifies a requirement for permanent UK Power Networks rights over the AP's land, UK Power Networks would seek to engage with the AP with a view to reaching a voluntary agreement, with compulsory acquisition remaining a measure of last resort should agreement not be reached. It is noted that the response from the AP mirrors that submitted by affected parties 25468 and 9410 (which UK Power Networks has responded to separately); however, UK Power Networks has not been notified of any land interest held by 2 Agriculture Growing Limited in relation to those landholdings. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

196. AP 196 - East Anglia Three Limited

196.1 Person with Interest in Land (PIL) Reference ID: 20335

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Note plot B-20/180 appears to be marked for compulsory acquisition on EN020027-002892-2.2 Land Plans – Section B, Revision C however is not marked for compulsory acquisition under the Book of Reference, this is to be clarified. In any event, it is marked in the Book of Reference for temporary possession, to which we object. East Anglia Three Limited (“EA3L”) is the developer of a consented Nationally Significant Infrastructure Project comprising offshore wind generation and associated onshore transmission infrastructure, and is directly affected by the Proposed Development. NGET seek CA and TP powers over land owned by ScottishPower Renewables (UK) Limited (“SPRUKL”), EA3L’s direct owner, in which EA3L has various rights. The compulsory acquisition and temporary possession of land owned by SPRUKL, in combination with powers sought under Articles 14 and 16 of the draft DCO to temporarily close Bullen Lane, would put EA3, a critical national infrastructure project, at risk. Bullen Lane is the only access road leading to the	Summary of Objection The AP, East Anglia Three Limited ("EA3L"), is the developer of a consented Nationally Significant Infrastructure Project comprising offshore wind generation and associated onshore transmission infrastructure. The AP's objection can be summarised as follows: (i) EA3L objects to the compulsory acquisition and temporary possession of land owned by ScottishPower Renewables (UK) Limited ("SPRUKL"), EA3L's direct owner, in which EA3L has various rights; (ii) Bullen Lane is the only access road to the EA3 substation and the access track to the SuDS pond, and 24/7 uninterrupted access is vital for fire, safety, and maintenance reasons; (iii) the Applicant has failed to comply with Section 122 of the Planning Act 2008 and the DCLG Guidance (September 2013), in that it has not demonstrated that the extent of CA and TP powers being sought is necessary; (iv) the extent of rights sought risks imposing excessive and unjustified restrictions on EA3L's ability to access, operate and maintain its infrastructure; and (v) the Applicant has not demonstrated a compelling case in the public interest in respect of the specific interference with EA3L's interests, as required by Section 122(3) of the Planning Act 2008. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure) and Class 5 (access). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. The Applicant notes the AP's concern regarding plot B-20/180, which appears to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

EA3 substation, and then to the access track used to access the SuDs pond for the EA3 substation. It is therefore vital that 24/7 uninterrupted access to the EA3 substation via Bullen Lane is maintained for fire and safety reasons, as well as to ensure the continued maintenance of the EA3 substation and SuDs pond, which are vital parts of the overall EA3 windfarm operation.

While EA3L does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests. In particular, EA3L submits that the Applicant has failed to comply with the requirements of Section 122 of the Planning Act 2008 and the Department for Communities and Local Government Guidance (September 2013) on compulsory acquisition. Section 122(2) requires that land or rights may only be acquired where they are necessary for the development or to facilitate it, and Section 122(3) requires a compelling case in the public interest.

EA3L's position is that the Applicant has not demonstrated that the extent of CA and TP powers being sought, which would allow the Applicant to exclude EA3L from using Bullen Lane, the access road to the EA3 substation, and the access track to the SuDs pond, rights is necessary. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified

Applicant's Response

marked for compulsory acquisition on the Land Plans but is not marked for compulsory acquisition under the Book of Reference; this will be clarified. In any event, the plot is marked in the Book of Reference for temporary possession, to which the AP objects.

Consolidated Response

The Applicant is undertaking significant engagement with EA3L over its concerns, as noted in the draft Statement of Common Ground between both parties, and is working to agree protections within a side agreement that would alleviate these concerns by confirming that the Applicant will provide the continuous access required. It is acknowledged that East Anglia Three Limited are a Statutory Undertaker to which Section 127 of the Planning Act 2008 would apply. SPRUKL, whilst the freehold owner, are not a Statutory Undertaker in respect of the EA1 Development Consent Order, as this is operated by TC EA ONE OFTO Limited. As acknowledged in EA3L's submission, the parties are working together to seek to agree terms for an interface agreement to resolve both East Anglia Three Limited's and SPRUKL's concerns. The AP also submitted draft Protective Provisions to the Applicant on 30 June 2026. The Applicant has considered these draft provisions in the context of the heads of terms for the legal interface agreement also being negotiated and provided an amended version of the Protective Provisions to the AP on 15 July 2026. This amended version of the Protective Provisions will also be submitted at Deadline 7. In the absence of conclusion of the legal interface agreement, the Applicant will submit a Section 127 submission explaining why there is no serious detriment to the undertaking of East Anglia Three Limited.

The Applicant acknowledges the concerns raised by East Anglia One Limited regarding the need for uninterrupted access. The Applicant confirms that the road closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, as secured in Paragraph 5.8.3 of the **7.3 Outline Construction Traffic Management Plan (Final Issue E) [REP6-082]**. Existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with East Anglia Three Limited.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
restrictions on EA3L's ability to access, operate and maintain its infrastructure. Furthermore, although EA3L recognises the general public benefits associated with the Proposed Development as transmission infrastructure, the Applicant has not demonstrated a compelling case in the public interest in respect of the specific interference with EA3L's interests, as required by Section 122(3). The assessment of public interest must consider the balance between the benefits of the scheme and the harm caused, and in this case there has been insufficient consideration of the cumulative interaction between two nationally significant infrastructure projects. EA3's infrastructure contributes to national renewable energy generation and decarbonisation objectives, and any restriction on its operation, maintenance or future development has the potential to undermine those objectives. In addition, the Applicant has not satisfied the requirements of the DCLG Guidance (paragraphs 8-10), which makes clear that compulsory acquisition should only be used where there is a compelling justification, that reasonable alternatives have been properly considered and that the extent of acquisition is proportionate. The Guidance requires that applicants minimise interference and use compulsory powers only as a last resort following reasonable negotiation. In this case, EA3L considers that the rights sought are disproportionate, that insufficient steps	("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
have been taken to minimise the extent of interference and that meaningful agreement has not yet been achieved. The proposals risk imposing safeguarding constraints and operational limitations. The principles underlying Section 127 of the Planning Act 2008 are also engaged, given the nature of EA3L's infrastructure as nationally important critical energy infrastructure. Those principles require that the Secretary of State cannot authorise the compulsory acquisition of statutory undertakers' land where this would cause serious detriment to the carrying on of the undertaking. EA3 holds an interest in the listed plots for the purposes of carrying on the construction and operation of the EA3 offshore windfarm. EA3 is significantly concerned that the Proposed Development will result in serious detriment to the carrying on of the construction and operation of the EA3 offshore windfarm by restricting access to the EA3 substation and its SuDs pond for maintenance and emergency works, increasing safety risks and imposing operational inefficiencies. The EA3 substation is a vital part of the overall windfarm operation, which is wholly dependent on the operation and function of the EA3 substation. Finally, EA3L considers that there has been insufficient engagement and negotiation in accordance with the DCLG Guidance (paragraph 25), which requires applicants to	smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
seek agreement wherever possible and to use compulsory acquisition only as a measure of last resort. While discussions have taken place, they have not resulted in agreed protective provisions or coexistence arrangements sufficient to safeguard EA3L's interests, and the Applicant's reliance on compulsory powers is therefore premature. Accordingly, EA3L objects to the compulsory acquisition powers sought over its rights.	during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

197. AP 197 - Hugh French, Guy French, Rockbrook Ltd, James French, E French & Sons

197.1 Person with Interest in Land (PIL) Reference ID: 14142

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to land or any being compulsorily acquired. National Grid should engage in meaningful negotiations with landowners over any land rights they require. Our Agents have advised there are various aspects to these negotiations which are reasonable comprises by the landowner, that National Grid is currently not agreei	Summary of Objection The Affected Person objects to the compulsory acquisition of land and rights, contending that National Grid should instead secure the necessary land rights through meaningful negotiation and voluntary agreement. Their agent advises that a number of reasonable compromises have been proposed by the landowner during negotiations, but these have not been accepted by National Grid. As a result, the Affected Person considers that agreement has not been reasonably pursued and maintains its objection to the compulsory acquisition powers sought. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure) and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 5 (access). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German, has met with the AP's representative on multiple occasions to negotiate and progress the Heads of Terms, most recently at a meeting held on 4th June 2026. Revised terms are to be issued in due course following those discussions and the Applicant continues to engage with the AP's agent in order to reach a voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

198. AP 198 - Hugh French, Guy French, James French

198.1 Person with Interest in Land (PIL) Reference ID: 2746

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to land or rights being compulsory acquired. National Grid should engage in meaningful negotiations with landowners over any land rights they require. Our Agents have advised there are various aspects to these negotiations which are reasonable comprises by the landowner, that National Grid is currently not agreeing to.	Summary of Objection impact on the farming operation and the loss of productive agricultural land within the Order Limits; (ii) concern that the proposed access routes associated with the Project will cause ongoing disruption to agricultural activities, including the movement of livestock and farm machinery; (iii) a contention that adequate engagement has not occurred and that the Heads of Terms issued are not acceptable; (iv) concern that the Applicant has not demonstrated a compelling case in the public interest sufficient to satisfy the Section 122 Planning Act 2008 tests; and (v) concern that the CA and TP powers being sought are premature and disproportionate to the landowners' interests in the land. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure) and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 5 (access). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The AP's objection can be summarised as follows: (i) concern about the The Applicant's land agent, Fisher German, has met with the AP's representative on multiple occasions to negotiate and progress the Heads of Terms, most recently at a meeting held on 4th June 2026. Revised terms are to be issued in due course following

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Applicant's Response

those discussions and the Applicant continues to engage with the AP's agent in order to reach a voluntary agreement.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

[REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-

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Applicant's Response

term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

- 198.1.1 The AP's objection can be summarised as follows: (i) East Anglia One Limited ("EA1L") objects to the compulsory acquisition and temporary possession of land in which it holds rights, specifically in relation to Bullen Lane which provides the only access to the EA1 substation and the access track to the SuDS pond; (ii) EA1L raises concerns about the safety and operability of its infrastructure during construction, noting that 24/7 uninterrupted access to its operational substation is essential for fire safety and emergency response, as well as maintenance; (iii) the AP contends that the Applicant has not demonstrated a compelling case in the public interest sufficient to justify the interference with EA1L's interests, as required by Section 122(3) of the Planning Act 2008; and (iv) the AP contends that the extent of CA and TP powers being sought is disproportionate and that the Applicant has not adequately sought to minimise the impact on EA1L's operations by agreement.

199. AP 199 - East Anglia One Limited

199.1 Person with Interest in Land (PIL) Reference ID: 13598

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Note plot B-20/180 appears to be marked for compulsory acquisition on EN020027-002892-2.2 Land Plans – Section B, Revision C however is not marked for compulsory acquisition under the Book of Reference, this is to be clarified. In any event, it is marked in the Book of Reference for temporary possession, to which we object. East Anglia One Limited ("EA1L") is the developer of a consented Nationally Significant Infrastructure Project offshore wind generation and associated onshore transmission infrastructure, and is directly affected by the Proposed Development. NGET seek CA and TP powers over land owned by ScottishPower Renewables (UK) Limited ("SPRUKL"), EA1L's direct owner, in which EA1L has various rights and generation assets within EA1's substation compound. The compulsory acquisition and temporary possession of land owned by SPRUKL, in combination with powers sought under Articles 14 and 16 of the draft DCO to temporarily close Bullen Lane, would put EA1, a critical national infrastructure project, at risk. Bullen	Summary of Objection The AP's objection can be summarised as follows: (i) East Anglia One Limited ("EA1L") objects to the compulsory acquisition and temporary possession of land in which it holds rights, specifically in relation to Bullen Lane which provides the only access to the EA1 substation and the access track to the SuDS pond; (ii) EA1L raises concerns about the safety and operability of its infrastructure during construction, noting that 24/7 uninterrupted access to its operational substation is essential for fire safety and emergency response, as well as maintenance; (iii) the AP contends that the Applicant has not demonstrated a compelling case in the public interest sufficient to justify the interference with EA1L's interests, as required by Section 122(3) of the Planning Act 2008; and (iv) the AP contends that the extent of CA and TP powers being sought is disproportionate and that the Applicant has not adequately sought to minimise the impact on EA1L's operations by agreement. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 – Compulsory Acquisition of Land). Powers of temporary possession (Class 7) are sought for National Grid in connection with the Project over land in which this AP holds an interest. The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 5 (access). Consolidated Response The Applicant notes that East Anglia One Limited is a National Significant Infrastructure Project developer holding rights over Bullen Lane, which provides the sole access route to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Lane is the only access road leading to the EA1 substation, where EA1L still holds generation assets within. It is therefore vital that 24/7 uninterrupted access to the EA1 substation via Bullen Lane is maintained for fire and safety reasons, as well as to ensure the continued maintenance of the EA1 substation, which are vital parts of the overall EA1 windfarm operation.

While EA1L does not object to the principle of reinforcing the electricity transmission network, it objects to the extent and justification of the powers sought over its interests.

EA1L's position is that the Applicant has not demonstrated that the extent of CA and TP powers being sought, which would allow the Applicant to exclude EA1L from using Bullen Lane, the access road to the EA1 substation, rights is necessary. The extent of rights sought is not limited to the minimum required but instead risks imposing excessive and unjustified restrictions on EA1L's ability to access, operate and maintain its infrastructure.

The principles underlying Section 127 of the Planning Act 2008 are also engaged, given the nature of EA1L's infrastructure as nationally important critical energy infrastructure. Those principles require that the Secretary of State cannot authorise the compulsory acquisition of statutory undertakers' land where this would cause serious detriment to the carrying on of the undertaking. EA1 holds an interest in the

Applicant's Response

its operational substation. The Applicant recognises the critical importance of maintaining continuous and uninterrupted access to EA1L's substation at all times during construction. The Applicant acknowledges the concerns raised by East Anglia One Limited regarding the need for uninterrupted access. The Applicant confirms that the road closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, as secured in Paragraph 5.8.3 of the **7.3 Outline Construction Traffic Management Plan (Final Issue E) [REP6-082]**. Existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with East Anglia One Limited and Scottish Power.. In addition, the AP also submitted draft Protective Provisions to the Applicant on 30 June 2026. The Applicant has considered these draft provisions in the context of the heads of terms for the legal interface agreement also being negotiated and provided an amended version of the Protective Provisions to the AP on 15 July 2026. This version of the Protective Provisions will also be submitted at Deadline 7. In the absence of conclusion of the legal interface agreement, the Applicant will submit a Section 127 submission explaining why there is no serious detriment to the undertaking of EA1L.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

listed plots for the purposes of carrying on the operation of the EA1 offshore windfarm. EA1 is significantly concerned that the Proposed Development will result in serious detriment to the carrying on of the operation of the EA1 offshore windfarm by restricting access to the EA1L's generation assets within the EA1 substation for maintenance and emergency works, increasing safety risks and imposing operational inefficiencies. The EA1 generation assets within the substation are a vital part of the overall windfarm operation, which is wholly dependent on the operation and function of the EA1 substation.

Applicant's Response

of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

200. AP 200 - Margaret Eileen Hamilton

200.1 Person with Interest in Land (PIL) Reference ID: 9148

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The recent paperwork appearing to outline plans for compulsory acquisition & holding by the operator after the construction project, when typically landowners provide easement rights for access and maintenance, requires clarification on case-by-case basis because CA of significant areas of land will affect agricultural activities for many parties including ourselves.	Summary of Objection The AP's objection can be summarised as follows: The landowner is concerned that recent documentation suggests permanent compulsory acquisition and retention of land by the operator, rather than the granting of easements or rights typically used for access and maintenance. They seek plot-specific clarification of the land rights being sought, arguing that the acquisition of significant areas of land could adversely affect agricultural operations and ongoing farm management activities. Land Rights Sought The Applicant understands that this AP's objection concerns land interests held as Freehold and Occupation within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: Class 2 (overhead line infrastructure), Class 3 (underground cable infrastructure), and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: Class 3 (underground cable infrastructure) and Class 5 (access). Powers of temporary possession (Class 7) are sought for both National Grid and UKPN in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant's land agent, Fisher German, held a meeting with the AP on 21st May 2026. The Heads of Terms were reviewed during that meeting and an updated draft of the Heads of Terms is to be issued to the AP in due course. The Applicant remains committed to engaging with the AP to progress towards a voluntary agreement and will continue discussions to address the outstanding matters that the AP has raised.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

The Applicant notes concerns raised by this AP regarding the nature of permanent access rights sought. For the avoidance of doubt, the Applicant confirms that permanent right of access would not be used during construction and would instead be relied upon infrequently in order to facilitate periodic inspections and maintenance activities. Wherever possible, permanent accesses have been routed so as to utilise existing public highway access points, gaps and gates between fields and to follow field boundaries. The most suitable route of access would be agreed between the Applicant and the AP at the time the access is required, noting that land use can change over time. Exercise of any such rights would not require the carrying out of physical works, save for occasional vegetation management activities which would be required to be undertaken in accordance with the controls imposed through the draft DCO. The Applicant therefore does not consider the permanent access rights sought to give rise to the degree of intrusion to the AP's use and enjoyment of their property that is suggested. The Applicant remains willing to discuss concerns about the manner in which access rights will be exercised in the context of ongoing HoTs negotiations.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

201. AP 201 - Stephen Chantry

201.1 Person with Interest in Land (PIL) Reference ID: 1857

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
apart from all the objections with regards the desecration of the countryside, wildlife, our family home worth nothing, the affects on the local community whilst work is carried out, road capabilities as we are always having floods, and that none of our concerns are looked into by national grid???, there are better ways underground or offshore SITE SPECIFIC OBJECTIONS: national grids plans show that part of our garden/paddock lie just east of TB207 , This is a area where there are ancient oaks,centuries old supporting a large range of wildlife, they are irreplaceable part of the local ecosystem. IMPACT ON STABLES AND HORSE WELFARE: near the affected area there are stables, during construction it would impact and distress the horses, noise, vibration and site activity could be disastrous. national grid have failed to demonstrate the need, the applicants justification under NPS EN-1 AND EN5 is weak. They have not adequately consider alternatives, use existing power lines or update them, go underground, offshore???.	Summary of Objection The Applicant understands that Stephen Chantry holds interests in land within the Project Order Limits by way of freehold, occupation and easement right or privilege. The objection raised by Stephen Chantry concerns, in summary: the Applicant's failure to consider alternatives and less intrusive options; the assertion that the land is not necessary for the scheme and that alternative routes could avoid acquisition of these rights; the contention that private loss and human rights impacts outweigh the public benefit with significant harm to landowners, businesses and livelihoods; insufficient pre-application preparatory work prior to the DCO application; inadequate engagement and negotiation with the Applicant; a lack of a compelling case in the public interest; concerns about whether affected parties will receive fair compensation; and the position that no Heads of Terms for a voluntary agreement have been agreed. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which Stephen Chantry holds an interest: Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant confirms that Version 2 of the Heads of Terms was issued on 9 April 2026. A meeting was subsequently held on 20 April 2026 between National Grid, its agent Fisher German and the Affected Person's agent to discuss the Heads of Terms and matters relating to the Affected Person's land interests. The Applicant has also attended Norfolk agent meetings at which the Affected Person's agent has been present. Following the 20

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ECOLOGY AND BIODIVERSITY , this has not been taken into consideration. Landscape and Heritage: We live in a listed building and the land is in the curtilage of this, placing a 50 metre pylon will totally obliterate the whole point of importance in the heritage and listed system. My family have all been affected by this proposal, my wife stressed and anxious now taking medication how can this be fair?. As far as ED miliband criticising (NIMBYs) as he calls people it has now come to light that his own wife fought against a proposal that would affect their home and it is not going ahead now??? how two faced is that. PLEASE RE THINK THIS SCHEME. KIND REGARDS STEPHEN CHANTRY	April meeting, Fisher German made further attempts to engage directly with the Affected Person, including visits to the property on 18 May 2026 and 6 June 2026; however, no contact was made on either occasion. The Applicant continues to engage with the Affected Person's representatives with a view to progressing negotiations. In relation to ecology and biodiversity, the Applicant can confirm the design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022–2025 period, the findings of which have inform the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Outline Code of Construction Practice [Revision G] contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project. The Applicant has also considered the concerns raised in relation to alternatives and routeing and siting, the Applicant's response is set out below. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Some APs have raised concerns about the effect of the Project on property value. The Applicant acknowledges that concerns about property value are understandable and takes them seriously. The impact of high voltage transmission infrastructure on residential property values, including potential effects arising from the proximity of pylons and overhead lines, has been considered as part of the Environmental Statement. The Applicant notes that property value impacts are a matter for the compensation regime rather than the planning/consenting regime. Compensation for any loss in land or property value caused by the exercise of statutory powers is governed by the statutory compensation code. Any such claims will be assessed on their individual merits, including by reference to evidence of any actual diminution in value, and the Applicant or its representatives will engage fully with any properly evidenced claims.

Some APs have raised concerns about the potential effects of electromagnetic fields ("EMF") on human health. The Applicant takes all health concerns seriously and has given careful consideration to the potential health impacts of EMF arising from the Project. The Project has been designed to comply with the restrictions set out in the Public Health (International Restrictions) Act 1984 and with the guidelines published by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), which represent the scientific consensus on safe limits of exposure to EMF. National Grid follows the voluntary code of practice on how electricity companies should manage EMF impacts and has applied this approach to the relevant plots. The EMF from this Project, when operated within those guidelines, does not give rise to a material risk to human health. The Applicant respectfully refers this Affected Person to the detailed EMF assessment contained in 6.12 Environmental Statement Chapter 12 – Human Health **[APP-252]**.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

The Applicant has also given careful consideration to the environmental impacts of the Project, including those relevant to the land and interests of this Affected Person. A comprehensive Environmental Impact Assessment has been undertaken and the results are presented in the Environmental Statement submitted with the Application. The assessment covers a wide range of environmental topics, including ecology, landscape and visual

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	impact, agriculture, noise, air quality, cultural heritage and socio-economic effects. Where significant effects have been identified, appropriate mitigation measures have been developed and committed to, including through 7.2 Outline Code of Construction Practice [Revision G], 7.4 Outline Landscape and Ecological Management Plan [Revision G], and other embedded mitigation documents. The Applicant is satisfied that the Environmental Statement demonstrates that the Project has been designed and will be delivered in a way which appropriately avoids, minimises and mitigates environmental effects, and that any residual effects are acceptable in the context of the compelling public interest in the delivery of the Project. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

The Applicant believes this comment refers to Ellices (NHLE 1297247) and confirms that this listed building has been assessed following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment **[Revision D]**, 6.11.A2

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Environmental Statement Appendix 6.11.A2 - Historic Environment Assessment Tables [Revision D] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]. The assessment has been informed by site visits, aerial and street-view imagery. During the operation phase, the Applicant concluded there is likely to be minor adverse significance of effect (not significant) on the asset and it would experience Lower Less Than Substantial Harm, with the closest pylon being c. 265m south-west with buildings intervening.

202. AP 202 - LIH Dunton Hills Limited (c.o Agents BTSurveyors)

202.1 Person with Interest in Land (PIL) Reference ID: 29095

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This response is a summary of LIH Dunton Hills Ltd's (LIH) position on interference with its land interests. A fuller explanation of these issues is set out in the Representations dated November 2025 submitted by BTS on behalf of LIH. LIH's primary concern relates to the proposed CA of rights for the works relating to Pylon TB 229 (in particular, plot G-6/133). As currently proposed, rights are sought over a wide area, and the exercise of the rights risks sterilising some land intended for residential development, and therefore may impact on the delivery of LIH's Dunton Hills Garden Village (DHGV) project. This potential conflict between the NTT project and LIH's developable land, and the extent of the interference with LIH's interests, is disproportionate and is not properly justified. This is particularly the case given that, based on discussions between the Applicant and LIH, design solutions may be available which would limit the impact on LIH's interests. LIH welcomes the engagement of the Applicant and progress towards agreeing	Summary of Objection The Applicant understands that LIH Dunton Hills Limited holds interests in land within the Project Order Limits by way of freehold, occupation, restrictive covenants and easement right or privilege. The objection raised by this Affected Person concerns, in summary: opposition to the compulsory acquisition and temporary possession powers sought by the Applicant in relation to their land; concerns about the impact of the proposed scheme on their development interests; the assertion that the Applicant has not adequately considered alternative alignments; and concerns about the proposed works affecting the phased residential development on their land. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which LIH Dunton Hills Limited holds an interest: Class 2 (overhead line infrastructure) and Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant can confirm that meetings were held via Microsoft Teams on 3rd November 2025 and 17th November 2025, and that a further meeting was held on 3rd November 2025, with the Affected Person's agent at BTSurveyors in attendance. The Applicant can further confirm that the pulling area for the adjacent pylon is likely to be reduced to avoid impact with the phased residential plots within this Affected Person's land, and that pylon TB229 has to be positioned to the west of the gas pipeline due to the presence of

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Heads of Terms for an agreement between the parties. The agreement is expected to include obligations which seek to address LIH's concerns through the detailed design process, including reviewing the works and location for Pylon TB229 to avoid or minimise material impacts on DHGV. Until terms are agreed, LIH maintains its objection to the proposed CA powers.

LIH does not object to the CA powers sought for diversion of the UKPN overhead 132 kV cables (PSC 3-7) but still intends to agree terms for voluntary acquisition of those rights.

Applicant's Response

residential properties and listed buildings to the east in that location. The positioning took into account and avoided reducing the extent of new build housing. Ongoing engagement is being maintained with the Affected Person and their agent to progress these matters.

In relation to the UKPN works, UK Power Networks are seeking the removal of existing 132 kV overhead line infrastructure from this Affected Person's land as part of the Project. UK Power Networks are in contact with this Affected Person (via their agent at BTSurveyors) and are seeking to agree land rights voluntarily. UK Power Networks support the position that both parties are working to reach voluntary agreement on the land rights required, and if voluntary agreement can be achieved compulsory acquisition will not be required.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-

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Applicant's Response

specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

203. AP 203 - SBS Spares Ltd

203.1 Person with Interest in Land (PIL) Reference ID: 3623

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to the rights being taken by compulsion. We are not against entering into a voluntary agreement and commencing in commercial negotiations with UK Power and /or National Grid or their agents. As you are aware we have appointed Landbridge land agents, Rivers Court, High Street, Sproughton, Ipswich IP8 3AP to act on our behalf. Future correspondence on this should be directed to them FAO Will Barton	Summary of Objection The Applicant understands that SBS Spares Ltd holds interests in land within the Project Order Limits by way of freehold, occupation and easement right or privilege. The objection raised by SBS Spares Ltd concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant in relation to their land; the necessity and proportionality of the rights sought; and the assertion that the Applicant has not adequately demonstrated a compelling case in the public interest. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which SBS Spares Ltd holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots relating to this Affected Person fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response The Applicant can confirm that this Affected Person holds Category 1 interests in land directly impacted by the UKPN diversion works, and Category 2 interests in land impacted by the new National Grid infrastructure. The Applicant has met recently with this Affected Person to progress Heads of Terms negotiations, and the Applicant confirms that both the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Category 1 and Category 2 interests are being progressed concurrently as part of those negotiations.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

204. AP 204 – Bianca Moller, Robert Moore

204.1 Person with Interest in Land (PIL) Reference ID: 12816

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed project for the following reasons: 1) Failure to properly consider alternatives to pylons The applicant has failed to adequately consider alternatives to the use of pylons for this project. Less intrusive options appear to exist, but these have not been properly assessed, explained, or justified. 2) Failure to consider less harmful alternatives The proposal does not demonstrate that the least damaging or least intrusive option has been selected. The applicant has not shown that alternative routes, technologies, mitigation measures, or methods of delivery have been fully explored in order to reduce the impact on affected landowners, businesses, homes, and livelihoods. 3) Disproportionate private loss and human rights impact The proposed project would cause very significant private loss and would have a serious impact on the rights and livelihoods of affected landowners and businesses. In our	The Applicant understands that Bianca Moller and Robert Moore are partners and that Ms Moller operates a rural wedding venue and shepherd's hut accommodation business in the vicinity of the Project. Mr Moore is the Category 1 landowner with whom the Applicant has engaged in relation to the affected land interests and Heads of Terms negotiations. Cullum Agri Ltd is the farming business associated with the wider landholding and agricultural operations referenced within the representations. Accordingly, the representations raise both landowner/farming concerns associated with Mr Moore/Cullum Agri Ltd and business-related concerns associated with Ms Moller's wedding venue operations. Engagement has taken place through Mr Moore and the parties' appointed land agent. Summary of Objection The Applicant understands that Cullum Agric Ltd holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by Cullum Agric Ltd concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the extent and proportionality of the rights sought; the contention that Heads of Terms negotiations have not been adequately progressed; the assertion that insufficient consideration has been given to alternatives, including undergrounding; and concerns about the impact of the Project on the farming business. Land Rights Sought The Applicant is seeking to acquire the following land and rights in relation to land in which Cullum Agric Ltd holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access), for National Grid. The Applicant is also seeking to acquire the following permanent rights for UKPN: Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable

Please summarise (in no more than 1500 words) the reason(s) for your objection

case, the proposed power lines would cross our farm and would cause substantial harm to our business, including the destruction of a wedding venue, which is the small farm's main source of income. This impact is severe, personal, and disproportionate. The harm to land, businesses, income, and way of life outweighs any public benefit that the applicant claims would arise from the project.

4)Lack of a compelling case in the public interest

The applicant has failed to demonstrate a compelling case in the public interest for this project in its proposed form. There has been insufficient justification for why the project must proceed using pylons, why this route has been selected, and why less intrusive alternatives have not been pursued.

5)Insufficient pre-application work and inadequate consultation

Prior to submitting the DCO application, the applicant failed to carry out sufficient detailed preparatory work, particularly in relation to consultation and engagement with affected landowners.

6)We have been trying to address the issue of the proposed power lines crossing our farm with the applicant for three years. Despite this, we have received limited feedback and there has been no meaningful progress towards resolving our concerns. This demonstrates inadequate engagement, poor communication,

Applicant's Response

infrastructure); and Class 5 (access). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought.

Consolidated Response

The Applicant can confirm that Heads of Terms negotiations are ongoing with this Affected Person. Site meetings have been held and a further meeting was offered following the meeting on 5th March 2026 to go through all information required. This Affected Person's agent attended the Norfolk agent meetings held on 19th June 2026. A further meeting is scheduled for 22nd July 2026 to continue progressing negotiations. Regarding the specific matters raised regarding construction works, these are addressed by the Applicant in document 8.5.6 of the Examination Library (Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2). In relation to the consideration of alternatives, including the question of undergrounding, the Applicant refers to its thematic response below.

The Applicant acknowledges the concern that the Project would adversely affect the operation of the wedding venue and associated business activities undertaken from the farm. The Applicant has considered the representation and notes that concerns regarding visual impacts on the wedding venue, the surrounding landscape and the wider rural setting have been raised throughout the consultation and Examination process.

The Applicant has assessed landscape and visual effects as part of the Environmental Statement and has considered routeing alternatives through the Project's design development process. The Applicant does not agree that the Project would result in the destruction of the wedding venue business. The Applicant recognises that the presence of the proposed overhead line may alter views experienced from the venue; however, the Project would not prevent the continued operation of the venue. The Applicant further notes that any loss, disturbance or diminution in value arising from the exercise of DCO powers would be addressed, where applicable, through the statutory compensation code. The Applicant remains willing to continue engagement with the Affected Person regarding the specific operation of the venue and associated agricultural activities to understand whether any practicable mitigation measures can be incorporated into construction planning and landowner discussions.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
and a failure to properly consult with those most directly affected. 7)Inadequate engagement and negotiation The applicant has not engaged with us in a constructive or meaningful way. Given the scale of the impact on our farm and business, we would have expected detailed discussions, proper negotiation, and genuine attempts to reduce or avoid the harm caused. This has not happened. I imagine many other businesses / farms have similar concerns 8)Compensation concerns We have serious concerns about whether affected parties will receive fair, adequate, and timely compensation. The damage to our business and livelihood would be substantial, and to date there has been no communication from the applicant about how losses will be assessed, how compensation will be calculated, and when compensation would be paid. 9)No heads of terms or voluntary agreement No heads of terms or voluntary agreement has been signed. This is due to the lack of meaningful engagement and negotiation by the applicant. The absence of agreed terms further demonstrates that the applicant has not properly addressed the impact of the project on our land and business. For these reasons, I object to the application. I ask that the Examining Authority gives	A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level. The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

significant weight to the severe impact on our farm, business, livelihood, and property rights, and requires the applicant to properly consider less intrusive alternatives before any consent is granted.

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

In relation to the question of undergrounding raised by this Affected Person, the Applicant notes that undergrounding of high voltage transmission circuits of this type has been considered. The Applicant is required to develop proposals in line with national policy and its regulatory duties. NPS EN-5 (2024) paragraph 2.9.20 sets out the Government's strong starting presumption in favour of overhead line technology. The Applicant has applied the mitigation hierarchy throughout the development of the Project and has considered undergrounding or other alternatives where the technical, environmental, economic and deliverability considerations make this appropriate. For the sections of route passing through this Affected Person's land, the Applicant is satisfied that overhead line technology represents the appropriate means of delivering the Project in this location in the context of national policy and the relevant regulatory environment. Further detail on the consideration of undergrounding and other alternatives is set out in 5.15 Design Development Report **[APP-122]** and the related Design Development Reports.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP122, 2024 in APP-359 and 2023 in APP-358]. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

205. AP 205 - Jeremy Nicholas John Sheppard

205.1 Person with Interest in Land (PIL) Reference ID: 2976

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
My wife and I own the freehold on Braddocks, a residential property situated on Mashbury Road, Chignal St James. The property is approximately 160 metres north of the proposed line of pylons and a crossing point for the haul road. Two plots of land on the property are the subject of compulsory acquisition. Firstly, a narrow strip of land forming the roadside margin which has been aggregated with other land to form plot F-6/24. Secondly, an area of approximately 72 sq metres contained within the boundary of the property, forming plot F-6/27. We contributed to both the statutory and landowner consultations and met with representatives of the applicant's agents, Fisher German, on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed compulsory acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure – primarily a water main, hydrant point, culverted land drain and overhead telephone and fibre optic cables which all lie within the boundary of	Summary of Objection The AP's objection can be summarised as follows: The AP objects to the compulsory acquisition of rights over plots F-6/24 and F-6/27 at their residential property, Braddocks, arguing that the Applicant has failed to explain the purpose, necessity and proposed use of the permanent rights sought despite previous engagement. The AP is concerned that the rights could interfere with existing infrastructure, including drainage, water and telecommunications apparatus, affect boundary hedgerows, trees and the property's principal access, and adversely impact the continued residential use, privacy, security and amenity of the property. The AP contends that less intrusive alternatives, including temporary rights, have not been adequately considered and that the permanent rights sought represent a disproportionate interference with their property interests and human rights. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). The Applicant can confirm that the affected plots refer to a section of public highway which the Applicant is seeking temporary rights over to apply a visibility splay to ensure safe design of the cross over bellmouths for the haul road. The Applicant is aware of a discrepancy between the Land Registry title plan, the Ordnance Survey mapping and the adopted highway boundary. It appears that the AP may have inadvertently become an affected person in relation to certain plots as a result of this discrepancy, and the Applicant has no plan to access the AP's private land in

Please summarise (in no more than 1500 words) the reason(s) for your objection

plot F-6/24. Fisher German assured us the requests had been passed back to the applicant however we have never received a response. With no response, the applicant has so far failed to provide any justification for seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives, including temporary rights of access, (Guidance para 8) and has failed to explain how the rights over the land will be used (Guidance para 9).

We also have more specific concerns about the impact of the proposed permanent rights and how they interfere with our property.

Plot F-6/24 : Properties on Mashbury Road are not connected to mains drainage. Treated effluent from Braddocks is discharged into the culverted drain within plot F-6/24. The permanent rights sought under Class 4 (g) and (h) can be used to render the property uninhabitable by allowing the applicant to prevent the removal of effluent from the property by decommissioning the drain and forbidding its replacement. This infringes on our Article 8 and Protocol 1 Article 1 rights under the ECHR.

Plot F-6/27 : This comprises two sections, 1) a narrow strip within which there is a mature 8 foot high mixed hawthorn hedge fronting onto Mashbury Road and some mature fruit trees within the garden itself, and 2) a surfaced area

Applicant's Response

this location. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide compliant and safe visibility at the crossover.

Consolidated Response

The Applicant can confirm that initial Heads of Terms (Version 1) were issued in October 2025. Version 2 of the Heads of Terms was not issued as, following further assessment of the Affected Person's interest, the Applicant determined that no land rights were required from this Affected Person. Accordingly, no further Heads of Terms negotiations were necessary, and no formal Heads of Terms meeting has been held. The Applicant notes that, whilst no rights are being sought from this Affected Person, the Applicant is happy to engage further on any concerns relating to the Project. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

Please summarise (in no more than 1500 words) the reason(s) for your objection

between Mashbury Road and the gate to Braddocks which comprises the primary access point to the property. The hedge provides security and privacy to the property however the permanent rights sought under Class 4 (b) and (e) would allow the applicant to require its removal and forbid any replacement. In the document Ref EN020027, submitted by the applicant, covering tree and hedgerow management all fruit trees in the garden are marked as “unaffected” and the hawthorn hedge is only classed as “potentially affected”. This strongly indicates that the permanent rights sought are unnecessary, the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient. In respect of the primary access to the property, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent rights sought is grossly disproportionate for this residential property. They constitute a disproportionate and severe infringement of our rights under Article 8 and Protocol 1 Article 1 of the ECHR (Guidance para 10) and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.

Applicant’s Response

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

The Applicant has given careful consideration to the environmental impacts of the Project on land in which this Affected Person holds an interest. A comprehensive Environmental

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Impact Assessment has been undertaken and the results are presented in the Environmental Statement submitted with the Application, covering ecology, landscape, noise, air quality, cultural heritage and socio-economic matters among others. Appropriate mitigation has been incorporated into the Project design and will be implemented during construction and operation, including through the Code of Construction Practice, the Landscape and Ecological Management Plan, and other embedded measures.

The Applicant also wishes to address the human rights concerns raised by this Affected Person. The Applicant acknowledges that the acquisition of land rights, and the use of CA and TP powers, engages fundamental rights including those protected under Article 8 of the European Convention on Human Rights (right to respect for private and family life) and Protocol 1, Article 1 (protection of property). The Applicant is satisfied that any interference with those rights is lawful, pursues a legitimate aim (namely the delivery of nationally significant infrastructure to meet an established need for electrical transmission capacity), and is necessary and proportionate in all the circumstances. The compensation code is available to those affected to ensure fair financial redress for any loss suffered as a result of the exercise of statutory powers. The Applicant's approach is consistent with the human rights framework applicable to schemes of this type.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

206. AP 206 - Susan Jane Sheppard

206.1 Person with Interest in Land (PIL) Reference ID: 1772

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
My husband and I own the freehold on Braddocks, a residential property situated on Mashbury Road, Chignal St James. The property is approximately 160 metres north of the proposed line of pylons and a crossing point for the haul road. Two plots of land on the property are the subject of compulsory acquisition. Firstly, a narrow strip of land forming the roadside margin which has been aggregated with other land to form plot F-6/24. Secondly, an area of approximately 72 sq metres contained within the boundary of the property, forming plot F-6/27. We contributed to both the statutory and landowner consultations and met with representatives of the applicant's agents, Fisher German, on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed compulsory acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure – primarily a water main, hydrant point, culverted land drain and overhead telephone and fibre optic cables which all lie within the boundary of	Summary of Objection The Applicant understands that Susan Jane Sheppard holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought; the necessity and proportionality of the rights sought; concerns about electromagnetic field ("EMF") effects on livestock; concerns about environmental impact; and human rights considerations arising from the Project's interference with private land. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). The Applicant can confirm that the affected plots refer to a section of public highway which the Applicant is seeking temporary rights over to apply a visibility splay to ensure safe design of the cross over bellmouths for the haul road. The Applicant is aware of a discrepancy between the Land Registry title plan, the Ordnance Survey mapping and the adopted highway boundary. It appears that the AP may have inadvertently become an affected person in relation to certain plots as a result of this discrepancy, and the Applicant has no plan to access the AP's private land in this location. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide compliant and safe visibility at the crossover. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
plot F-6/24. Fisher German assured us the requests had been passed back to the applicant however we have never received a response. With no response, the applicant has so far failed to provide any justification for seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives, including temporary rights of access, (Guidance para 8) and has failed to explain how the rights over the land will be used (Guidance para 9). We also have more specific concerns about the impact of the proposed permanent rights and how they interfere with our property. Plot F-6/24 : Properties on Mashbury Road are not connected to mains drainage. Treated effluent from Braddocks is discharged into the culverted drain within plot F-6/24. The permanent rights sought under Class 4 (g) and (h) can be used to render the property uninhabitable by allowing the applicant to prevent the removal of effluent from the property by decommissioning the drain and forbidding its replacement. This infringes on our Article 8 and Protocol 1 Article 1 rights under the ECHR. Plot F-6/27 : This comprises two sections, 1) a narrow strip within which there is a mature 8 foot high mixed hawthorn hedge fronting onto Mashbury Road and some mature fruit trees within the garden itself, and 2) a surfaced area	The Applicant can confirm that initial Heads of Terms (Version 1) were issued in October 2025. Version 2 of the Heads of Terms has not yet been issued in respect of this Affected Person's interests, as this Affected Person holds third party rights only. No formal Heads of Terms meeting has been held to date. The Applicant notes that this Affected Person's property is in close proximity to the proposed line. The position in relation to the rights sought, engagement undertaken, and thematic matters raised is the same as set out in relation to Jeremy Nicholas John Sheppard above, and the Applicant incorporates those responses here by reference. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be

Please summarise (in no more than 1500 words) the reason(s) for your objection

between Mashbury Road and the gate to Braddocks which comprises the primary access point to the property. The hedge provides security and privacy to the property however the permanent rights sought under Class 4 (b) and (e) would allow the applicant to require its removal and forbid any replacement. In the document Ref EN020027, submitted by the applicant, covering tree and hedgerow management all fruit trees in the garden are marked as “unaffected” and the hawthorn hedge is only classed as “potentially affected”. This strongly indicates that the permanent rights sought are unnecessary, the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient. In respect of the primary access to the property, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent rights sought is grossly disproportionate for this residential property. They constitute a disproportionate and severe infringement of our rights under Article 8 and Protocol 1 Article 1 of the ECHR (Guidance para 10) and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.

Applicant’s Response

completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

The Applicant has given careful consideration to the environmental impacts of the Project on land in which this Affected Person holds an interest, and refers to the Environmental Statement and embedded mitigation measures as set out in the response in respect of Jeremy Nicholas John Sheppard above.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	The Applicant also wishes to address the human rights concerns raised by this Affected Person. The Applicant is satisfied that any interference with the rights protected under Article 8 ECHR and Protocol 1, Article 1 is lawful, pursues the legitimate aim of delivering nationally significant infrastructure, and is necessary and proportionate in all the circumstances, having regard to the compensation code available to those affected. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

207. AP 207 - Alex Haden - BTSurveyors Ltd - Representative of Orsett Golf Club

207.1 Person with Interest in Land (PIL) Reference ID: 10292

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The grounds for objection have been outlined in our previous Representations on behalf of Orsett Golf Club (November 2025 & February 2026). We are in ongoing, discussions with National Grid and their appointed agents with a view to covering outstanding matters within a confidential Heads of Terms Agreement.	Summary of Objection The Applicant understands that Orsett Golf Club holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant in relation to the Golf Club's land; the necessity and proportionality of the rights sought; and the potential impact of the Project works on the Golf Club's operations, including in relation to the practice green and golfing pods. Land Rights Sought The Applicant is seeking to acquire the following land and permanent rights for National Grid over land in which this Affected Person holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response The Applicant can confirm that meetings have been held with this Affected Person and/or its agent on 17th October 2025, 6th January 2026, 16th January 2026, 11th June 2026 and 22nd June 2026, and the 9th July 2026 to assess the alignment of towers TB260 and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	TB261. Further LIDAR surveys are to be undertaken following the latest meeting on 9th July 2026. Discussions have taken place regarding the potential loss of the practice green and golfing pods as a result of the proposed works, and the Applicant is continuing to engage with this Affected Person with a view to exploring means of reducing impact on the Golf Club's operations. The Applicant remains committed to continuing this engagement and to reaching a voluntary agreement where possible. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation

of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

208. AP 208 - Monika Weglarz, TLT on behalf of Basildon BESS Ltd

208.1 Person with Interest in Land (PIL) Reference ID: 27173

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Basildon BESS Ltd has previously stated, in its relevant representation [RR-0334], its written representation [REP1-203] and at the compulsory acquisition hearing on 29 April, that it has an installation, on leased land, in parts of plots H-1/1, H-1/5 and H-1/11 comprising of an operational Battery Energy Storage System to the north of the UKPN substation. Basildon BESS has been liaising with the Applicant in respect of these plots and the interests that are sought over them and during these discussions it has become apparent that Basildon BESS does not have an interest in plot H-1/11. In respect of the remaining two plots, the parties have recently agreed the wording of a side agreement. However, the agreement has not yet reached completion and, until such a time as it does, Basildon BESS maintains its strong objection to the Applicant's proposals in their current form.	Summary of Objection The Applicant understands that Basildon BESS Ltd holds interests in land within the Project Order Limits by way of leasehold, occupation and easement right or privilege. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of the rights sought; and the assertion that the Applicant has not adequately demonstrated a compelling case in the public interest. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots relating to this Affected Person fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response The Applicant confirms that it has agreed the wording of a side agreement with this Affected Person which it understands fully resolves their concerns. The Applicant anticipates that this side agreement will be completed prior to Deadline 7.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Insofar as the AP has any overarching concerns about the to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant sets out its full response here.

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	[REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

209. AP 209 - TC East Anglia One OFTO Limited

209.1 Person with Interest in Land (PIL) Reference ID: 13598

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Please note that TC East Anglia One OFTO Limited leases land and benefits from rights in adjoining land, but they do not feature in the Book of Reference. We are wrongly not detailed in this document [Book of Reference]. This needs to be rectified as it has been raised previously. [See previous submissions]	Summary of Objection The Applicant understands that TC East Anglia One OFTO Limited holds interests in land within the Project Order Limits by way of leasehold, restrictive covenants and easement right or privilege. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of those powers; and the assertion that the Applicant has not established a compelling case in the public interest justifying the acquisition of the rights sought over this Affected Person's land. Land Rights Sought The Applicant is seeking to acquire the following land and permanent rights for National Grid over land in which this Affected Person holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); and Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant acknowledges TC East Anglia One OFTO Limited's concern that its interests are not currently identified within the 4.3 Book of Reference. The Applicant notes that TC East Anglia One OFTO Limited has asserted that it holds leasehold interests and benefits from rights in adjoining land associated with the operation of the East Anglia One OFTO undertaking. The Applicant has been engaging with TC East Anglia One OFTO Limited and its advisers regarding the Project's interaction with those interests and continues to progress a legal interface agreement and associated protective provisions. The Applicant will continue to review the relevant land interest information and, where appropriate, update the relevant land documentation to ensure that interests requiring identification for the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

purposes of the Application are accurately recorded. Discussions between the parties remain ongoing. The Applicant has proposed to the AP's lawyers that heads of terms for a legal interface agreement shall be substantially based on those settled with EA1L. The AP's lawyers have not yet confirmed instructions however, the Applicant will also submit Protective Provisions based on those offered to EA1L at Deadline 7. The Applicant confirms that the road closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, as secured in Paragraph 5.8.3 of the **7.3 Outline Construction Traffic Management Plan (Final Issue E) [REP6-082]**. Existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with East Anglia One Limited and Scottish Power. In the absence of conclusion of the legal interface agreement, the Applicant will submit a Section 127 submission explaining why there is no serious detriment to the undertaking of TC East Anglia One OFTO Limited.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

210. AP 210 - PACE Nano Energy Limited

210.1 Person with Interest in Land (PIL) Reference ID: 15947

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Until such time as the Commercial Agreement between PACE Nano Energy Ltd and NGET is executed, PACE objects to the compulsory acquisition of its rights and interests in land and the temporary use of the land it holds an interest in. Once completed, the terms of the Commercial Agreement will resolve PACE's concerns with the interference of its rights and following which PACE Nano will withdraw its objection. PACE refers to its previous submissions in this examination ([REP-2789], [REP1-264], [REP3-129] and [REP5- 261]) and the draft Statement of Common Ground ([REP4-227]) between the parties for context of the issues and reasons for objection.	Summary of Objection The Applicant understands that PACE Nano Energy Limited holds interests in land within the Project Order Limits by way of easement right or privilege and restrictive covenants. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of the rights sought; and concerns about the impact of the Project on the interests held by this Affected Person in the land. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds a Category 2 interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response Category 2 Persons with an Interest in Land are identified and consulted in accordance with the requirements of the Planning Act 2008. However, populated Heads of Terms are not ordinarily issued to Category 2 interests because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder, or through the exercise of the powers sought in the Order, rather than through a separate voluntary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

agreement with each individual Category 2 interest. Whilst Heads of Terms are not generally required, Category 2 persons remain entitled to participate in the DCO process and, where applicable, may be entitled to compensation under the statutory compensation code should they suffer loss arising from the exercise of the Order powers. The Applicant will continue to engage with affected persons throughout the Examination and implementation of the Project.

The Applicant confirms that it has been engaging with this Affected Person regarding the land rights required and remains committed to progressing negotiations with a view to reaching a voluntary agreement. A settlement agreement is currently being discussed to facilitate a SoCG. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

211. AP 211 - Gillian Ann Whittle

211.1 Person with Interest in Land (PIL) Reference ID: 3768

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Neither NG nor UK Power Networks have need or necessity for these rights over our land. The impact would be disproportionate, and there has been a severe lack of communication and negotiation to acquire any such rights at any point. Communication from NG or Fisher German has been absolutely zero since a meeting with them on 19th June 2024, when they promised to be in touch with answers within a couple of weeks. Their lack of engagement with people and communities in these circumstances has been wholly inadequate, despite NG's claims to have communicated fully.	Summary of Objection The Applicant understands that Gillian Ann Whittle holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; and the necessity and proportionality of the rights sought in relation to the land in which she holds an interest. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure) and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). Consolidated Response UK Power Networks can confirm that they do not have any works at this location and do not require any land rights in respect of this Affected Person's land. No engagement has been undertaken by UK Power Networks or is necessary in connection with this Affected Person. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

212. AP 212 - Nicola Jane Underwood

212.1 Person with Interest in Land (PIL) Reference ID: 16149

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
My husband and I purchased a very small piece of land behind our house, [REDACTED] from Writtle Agricultural College in December 2016. We have tried to inform you on several occasions that we do not think that our land is part of this process and we do not own any other land in this area and certainly have no knowledge of ownership of the 13 parcels of land that appear on your document REP4-051 in our names. We believe these parcels of land probably do, or used to belong to Writtle Agricultural College. We have been unable to identify our land as being listed on the document REP4-051 at all. Our TP1 form location map shows a Search Reference of: 1617_00939 and the Property Address as: [REDACTED]	Summary of Objection The Applicant understands that Nicola Jane Underwood holds an easement right or privilege in land within the Project Order Limits. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of those powers in relation to the land in which she holds an interest; and concerns about the Project's impact on her interests. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for the Applicant over land in which this Affected Person holds a Category 2 interest as per rights as contained in a transfer dated 15 December 2016: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant notes that this Affected Person holds a Category 2 interest by way of easement right or privilege only. No Heads of Terms have been issued to this Affected Person to date, as this category of interest does not require Heads of Terms in the same way as a freehold or leasehold interest. The Applicant remains committed to engaging with

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

this Affected Person in relation to their interest and clarifying the position in respect of the Class 2 rights in the land as the Project progresses.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions, and refers to Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]** and 8.5.2 **[REP1-138]** as set out in full above.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. The Applicant respectfully disagrees with those assertions and refers to its submissions at Compulsory Acquisition Hearing 1 **[REP1-138]** and the submission quoted in full in the responses to other APs above.

A number of APs have also asserted that the Applicant has failed to act in accordance with the MHCLG 2013 Guidance. The Applicant refers, in response, to its submissions at **[REP1-138]** and, in particular, to its submissions regarding Paragraph 25 of the Guidance, which recognises that for long, linear schemes it may not always be practicable to acquire by agreement each plot of land and that it is reasonable to include provision authorising compulsory acquisition covering all land required at the outset. The Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

213. AP 213 - Stephen Hilary Underwood

213.1 Person with Interest in Land (PIL) Reference ID: 16148

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
My wife and I purchased a very small piece of land behind our house, [REDACTED] from Writtle Agricultural College in December 2016. We have tried to inform you on several occasions that we do not think that our land is part of this process and we do not own any other land in this area and certainly have no knowledge of ownership of the 13 parcels of land that appear on your document REP4-051 in our names. We believe these parcels of land probably do, or used to belong to Writtle Agricultural College. We have been unable to identify our land as being listed on the document REP4-051 at all. Our TP1 form location map shows a Search Reference of: 1617_00939 and the Property Address as: [REDACTED]	Summary of Objection The Applicant understands that Stephen Hilary Underwood holds an easement right or privilege in land within the Project Order Limits. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of those powers in relation to the land in which he holds an interest; and concerns about the Project's impact on his interests. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds a Category 2 interest as per rights as contained in a transfer dated 15 December 2016: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response As is the position in respect of Nicola Jane Underwood (above), this Affected Person holds a Category 2 interest by way of easement right or privilege only. No Heads of Terms have been issued to this Affected Person, as this category of interest does not require Heads of Terms in the same way as a freehold or leasehold interest. The Applicant remains committed to engaging with this Affected Person and clarifying the position in respect of

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	their Class 2 rights in the land as the Project progresses. The thematic responses applicable to this Affected Person are the same as those set out in the response to Nicola Jane Underwood above, and the Applicant incorporates those responses here by reference, including in relation to CA and TP powers, the extent of rights sought, compensation, Section 122, Section 123, the MHCLG 2013 Guidance, and funding.

214. AP 214 - Bank of Ireland UK Plc

214.1 Person with Interest in Land (PIL) Reference ID: 24735

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Summary of Objection No written reasons for objection have been provided by the AP. The Applicant understands that Bank of Ireland UK Plc holds a mortgage interest in land within the Project Order Limits. The objection raised by this Affected Person concerns the inclusion of plots of land in which Bank of Ireland UK Plc holds a mortgage interest within the Order Limits and the associated compulsory acquisition powers. Land Rights Sought The Applicant can confirm that all plots relating to Bank of Ireland UK Plc's land interests fall within Class 8 (white land). No compulsory acquisition or temporary possession powers are sought in respect of any of these plots. As a consequence, the Applicant submits that the concerns raised by Bank of Ireland UK Plc regarding the acquisition of their mortgaged interest are addressed by the fact that no active acquisition powers are sought, and no engagement in relation to Heads of Terms is necessary or has been undertaken in relation to these plots. Consolidated Response Notwithstanding the above, the Applicant notes the following in relation to the thematic matters raised by this Affected Person. The Applicant refers to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes why powers of CA and TP are justified in the context of the Project and why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily where required. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance. As those documents make clear, the Applicant's strong preference is to acquire land and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	rights voluntarily, with CA and TP powers sought only as a necessary fall-back mechanism. The Applicant is satisfied that the statutory tests under Sections 122 and 123 of the Planning Act 2008 are conclusively met and that it has acted in full accordance with the MHCLG 2013 Guidance. Funding for the Project is confirmed by the 4.2 Funding Statement [REP3-016] and by RII04 designation and Accelerated Strategic Transmission Investment status.

215. AP 215 - Tessa Saunders, Anglian Water Services Limited

215.1 Person with Interest in Land (PIL) Reference ID: 10188

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Anglian Water Services Limited (AWSL) is raising objections to those plot numbers where we have a freehold interest and matters are not resolved in respect of compulsory acquisition of rights over our land assets or temporary use. This includes our following assets: Land at Bracon Ash; Forncett End water recycling centre (WRC); Roydon-Barnards Lane Pumping Station, Bressingham Road; Land at Ardleigh – Dedham Road; Ardleigh-Wick Lane Reservoir; Shenfield and Hutton WRC. These matters are listed in the draft Statement of Common Ground between the Applicant and AWSL [REP4-101], as matters under discussion. Whilst AWSL has a large number of assets (i.e. sewers and water mains) on plots where our land interest is identified as 'occupation' these interfaces will be addressed through the bespoke Protective Provisions for Anglian Water, which are substantively agreed, but not yet included on the face of the draft Development Consent Order (DCO). The compulsory acquisition of rights and temporary	Summary of Objection The Applicant understands that Anglian Water Services Limited holds interests in land within the Project Order Limits by way of occupation, freehold, easement right or privilege and restrictive covenants. The objection raised by this Affected Person concerns are in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of those powers; and the impact of the Project on Anglian Water Services Limited's operational land and infrastructure, including in relation to the Ardleigh-Wick Lane Reservoir. Site Specific Response Shenfield and Hutton WRC: The Applicant and Anglian Water have continued discussions regarding the interface between the proposed overhead line, the WRC operational area and Anglian Water’s AMP8 investment programme. A site-focused engagement meeting is being progressed with operational staff to review fire risk considerations, access requirements, the proposed use of the existing access track as a haul road and any implications for future phosphorus removal upgrades. The parties are working collaboratively to identify any operational constraints and agree appropriate mitigation measures to ensure the continued operation and future development of the site. Forncett End WRC: Significant technical engagement has taken place regarding the interaction between the proposed overhead line and Anglian Water’s planned AMP8 nutrient removal scheme. Following detailed discussions, Anglian Water is reviewing the available options and considering its preferred way forward, with both parties continuing to collaborate on a solution that supports delivery of the AMP8 upgrade while accommodating the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

use of our land is still under discussion with the Applicant.

Shenfield and Hutton WRC: AWSL's agents, Savills, are awaiting a date for a site visit with National Grid's contractors to discuss mitigations of the proposed access route.

Forngett End WRC: AWSL is progressing the phosphorus and nitrogen removal schemes due for delivery at the WRC by 31 March 2030. This will assess the alternative land offered by the Applicant.

Ardleigh-Wick Lane Reservoir: The Applicant held a meeting with AWSL and Affinity Water to discuss the proposals including overhead line and easement across the reservoir and UKPN diversion works. A Land Disposal Risk Assessment has been prepared and circulated for review.

Our Estates Partner, Savills, is liaising with the Applicant's Lands Team on a number of these interfaces. For each location a Land Disposal Risk Assessment is being prepared.

When Anglian Water disposes of any property, whether freehold, leasehold or an easement right, the Estates Partner uses the Land Disposal Risk Assessment (LDRA) to document and confirm approval of the proposal. This ensures that the relevant stakeholders have been consulted and that any potential issues are identified and appropriately mitigated.

Applicant's Response

Ardleigh-Wick Lane Reservoir: The Applicant has undertaken joint discussions with Anglian Water and Affinity Water to review the potential effects of the overhead line crossing on reservoir operations, water quality, recreational activities and emergency response procedures. Initial discussions indicated that impacts are expected to be limited, however further confirmation is being sought through Anglian Water's land disposal risk assessment and consideration by the Ardleigh Reservoir Committee. Ongoing engagement will focus on confirming any operational constraints and agreeing any site-specific mitigation measures required during construction and operation. **Land Rights Sought**

The Applicant is seeking to acquire the following land and permanent rights for National Grid over land in which this Affected Person holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); Class 5 (access); and Class 6 (drainage infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought.

Consolidated Response

In relation to the UKPN works, UK Power Networks can confirm that a meeting was held on 3rd June 2026 between UK Power Networks and the affected parties regarding the Ardleigh-Wick Lane Reservoir. The Applicant notes that the reservoir is jointly owned with Affinity Water. UK Power Networks are seeking to arrange a further site meeting with both parties. UK Power Networks will continue to engage with all relevant parties with a view to agreeing land rights voluntarily.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

The four stakeholders that are consulted are the Site Manager of the affected property, who reviews whether the proposal impacts the day-to-day operation of the site; the Asset Delivery Planning team, who assess whether there are any future schemes planned for the site that may be affected by the proposal; the Biodiversity Team, who review any potential impacts on Anglian Water's environmental commitments, particularly in relation to Biodiversity Net Gain; and the Estates team, who consider any estate-related matters such as covenants or existing agreements affecting the land parcel in question. Both the Site Manager and Asset Delivery Planning teams are consulted to review the impact of the proposal on Anglian Water's duties as a statutory undertaker, both now and in the future.

In respect of Ardleigh in this example, AVH Parks, who manage the recreational activities on behalf of Anglian Water, will also be consulted and included within the LDRA process. For example, where a commercial activity may be affected by a compulsory purchase proposal, mitigation may include a business loss claim.

If all relevant stakeholders agree to the proposal and the associated mitigation measures, the matter is then referred to the Commercial Team, who manage the Estates Partner function within Anglian Water, to

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
provide final approval. This process ensures that all affected stakeholders have formally confirmed their approval of the proposal. The approved Land Disposal Risk Assessment then forms part of the legal instruction to Anglian Water's in-house legal department, who will complete the relevant agreement with support from the Estates Partner. This process will help inform ongoing discussions with the Applicant.	The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions and refers to Section 6 of [REP3-010] and its submissions at [REP1-138] as set out fully in earlier responses above. In particular, the Applicant confirms that all Order Land is either required for the Project or is required to facilitate or is incidental to it, and that there is a compelling case in the public interest for compulsory acquisition. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. The Applicant respectfully disagrees with those assertions and refers to its submissions at [REP1-138]. A number of APs have also asserted that the Applicant has failed to act in accordance with the MHCLG 2013 Guidance. The Applicant refers to its submissions at [REP1-138] and

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Paragraph 25 of the Guidance, which recognises that for long, linear schemes it may not always be practicable to acquire by agreement each plot of land, and that it is reasonable to include provision authorising compulsory acquisition covering all land required at the outset. The Applicant is satisfied that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

216. AP 216 - Ian Nicholas Thomson

216.1 Person with Interest in Land (PIL) Reference ID: 5342

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: • There must be a compelling case in the public interest for compulsory acquisition. • The land or rights sought must be necessary for the development. • The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the scheme, as	Summary of Objection The Applicant understands that Ian Nicholas Thomson holds interests in land within the Project Order Limits by way of freehold, occupation and easement right or privilege. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of the rights sought; concerns about the extent of land affected and the ability to reduce the land in the Heads of Terms; concerns about the impact of construction access on the highway; and the assertion that the Applicant has not adequately considered reasonable alternatives. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response Version 2 of the Heads of Terms was issued to this Affected Person on 9th April 2026. Dialogue with this Affected Person's agent (Simon Gilbey) is ongoing. The most recent

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: • Severe disruption to farming operations • Safety risks arising from construction routes • Loss of residential amenity • Interference with existing infrastructure and utilities • Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests	meeting took place on 12th May 2025 to discuss accommodation works, terms and severed areas. A further meeting was requested on 4th June 2026 with the agent to discuss the possibility of reducing the extent of land included in the Heads of Terms, and the Applicant is currently awaiting a response to that request. In relation to the construction access and site access matters, the Applicant confirms that site access has been designed to meet highway standards and a Stage 1 Road Safety Audit has been undertaken. A summary of all Road Safety Audits undertaken are provided in 7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]. The Applicant is not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). On-site BNG will be delivered within Environmental Areas. These are multi-functional areas within the Order Limits where standard and embedded mitigation (such as landscape and visual mitigation) will be delivered alongside biodiversity gains. Discussions with affected landowners are ongoing. Haul roads have been routed to allow for safe highway access, including appropriate bellmouth arrangements. In relation to the alternatives concern raised, the Applicant refers to the thematic response below. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: • National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. • Certain areas appear to be included for flexibility or convenience rather than strict necessity. • This is especially evident in relation to, haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include: • Permanent disruption of agricultural land where temporary access could achieve the same objective • Overly wide or intrusive haul roads	a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant can confirm we are not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). Habitat creation and enhancement will be delivered within Environmental Areas, which are multi-functional areas within the Order Limits, where standard and embedded mitigation (such as landscape and visual mitigation) will be

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
- Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: - The scheme imposes significant and concentrated burdens on specific landowners and communities - These burdens are not adequately mitigated or justified by the chosen route - The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial	delivered alongside biodiversity gains. Any BNG deficit determined following detailed design will be delivered offsite through registered BNG providers. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees and refers to [REP3-010] and [REP1-138] as set out in full in earlier responses above. Similar assertions have been made regarding Section 123, and the Applicant again refers to [REP1-138]. The Applicant is also satisfied it has acted in full accordance with the MHCLG 2013 Guidance, having regard to Paragraph 25 as explained above. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
evidence that this has not been adequately carried out. Examples include: • A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors • Use of existing redundant pylon routes instead of constructing entirely new infrastructure • Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include: • Residential impact: properties becoming unlettable due to proximity to haul roads • Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access	routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP122, 2024 in APP-359 and 2023 in APP-358].

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
- Community disruption: interference with footpaths, local routes, and daily activities - Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment - Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: - The consultation process fell short of statutory requirements - There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts - Professional and legal opinions (including from senior counsel) conclude that the	Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

process is insufficient to support a Development Consent Order (DCO)

If established, these deficiencies could mean that:

- The Secretary of State cannot be satisfied that all relevant considerations have been taken into account
- The statutory tests under sections 122 and 123 cannot properly be met

6. Failure to Engage and Negotiate

Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers.

However, the evidence suggests:

- Negotiations have been ongoing for several years without resolution
- Landowners have not been provided with final or clear terms
- NG will not engage with landowners suggestions of even minor changes/ameliorations
- The promoter continues to revise fundamental aspects such as the basis of compensation claims

This raises concerns that:

- Compulsory acquisition powers are being used prematurely

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- The statutory expectation of meaningful negotiation has not been fulfilled

Such failures weigh against the existence of a compelling case in the public interest.

7. Deliverability and Design Concerns

Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including:

- Insufficient detail on infrastructure such as bridges across flood-prone areas
- Construction proposals that are impractical or unsafe
- Lack of clarity on how temporary works would be implemented and restored

Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it.

8. Application of Sections 122 and 123

Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests:

Section 122 (Necessity)

- Land and rights are broader than required
- Alternatives exist that would reduce land-take
- The scheme has not been optimised to minimise interference

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- Section 123 (Compelling Case in the Public Interest)
- Impacts on landowners are severe and disproportionate
- Consultation and alternatives analysis are inadequate
- Negotiation efforts have been insufficient
- The balance between public benefit and private harm is not properly justified

9. Conclusion

In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008.

The evidence indicates that:

- The extent of compulsory acquisition is not fully justified
- Less intrusive alternatives have not been adequately considered
- The impacts on affected landowners and communities are excessive
- Procedural shortcomings undermine confidence in the scheme

Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

To proceed lawfully, National Grid need to:

- Demonstrate genuine optimisation of the route and access arrangements
- Provide clear evidence of alternatives being properly assessed
- Engage meaningfully with affected parties
- Ensure that land acquisition is strictly limited to what is necessary

Absent such steps, the justification for compulsory powers remains open to significant challenge.

217. AP 217 - Carolyn Gordon, Northumbrian Water Ltd

217.1 Person with Interest in Land (PIL) Reference ID: 10192

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
REP4-381, REP5-279 NWL have undertaken an initial and high-level desktop study and have identified a number of key or strategic assets that are shown to be within the revised red line boundary of the Proposed Scheme. Further engagement is required to understand the impact on NWLs assets before removing any objection to the proposed limit changes.	Summary of Objection The Applicant understands that Northumbrian Water Ltd holds interests in land within the Project Order Limits by way of occupation, freehold, easement right or privilege and restrictive covenants. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of those powers; the adequacy of the pre-application and ongoing consultation and engagement with Northumbrian Water Ltd; and the impact of the Project on Northumbrian Water's operational infrastructure, including the pumping station and the Langham holding. Land Rights Sought The Applicant is seeking to acquire the following land and permanent rights for National Grid over land in which this Affected Person holds an interest: Class 1 (compulsory acquisition of land); Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); Class 5 (access); and Class 6 (substation and associated infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant continues to engage constructively with Northumbrian Water Ltd ("NWL") in respect of both land rights and the interaction between the Proposed Development and NWL's operational assets. NWL has identified a number of strategic assets within or in proximity to the revised Order Limits and has indicated that further engagement is required to understand the impact of the Proposed Development before its objections can be withdrawn.

In relation to the pumping station and associated Protective Provisions, the Applicant has provided revised Protective Provisions to NWL and discussions remain ongoing. The Applicant's understanding is that the majority of provisions are agreed, with discussions principally focused on a limited number of outstanding matters, including cost-sharing arrangements and the mechanisms for protecting NWL's operational infrastructure. The Applicant remains committed to resolving these matters through continued engagement.

In relation to NWL's wider land interests, including the Langham holding, the Applicant has undertaken ongoing engagement with NWL and has provided information, including GIS/KML data, to assist NWL in understanding the interaction between its assets and the Proposed Development. The Applicant acknowledges NWL's request for further technical engagement regarding the revised Order Limits and the effect on its strategic assets and remains willing to meet with NWL to progress those discussions. The Applicant's position is that engagement remains active and constructive and that the outstanding issues are capable of being resolved through continued technical and commercial discussions between the parties. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees and refers to Section 6 of **[REP3-010]** and its submissions at **[REP1-138]** as set out in full in earlier responses above.

In relation to the adequacy of consultation concerns, the Applicant notes that it has undertaken an extensive and well-documented pre-application consultation programme. This is evidenced in the 5.1 Consultation Report **[APP-066]** submitted with the Application. The Applicant has also continued to engage with Northumbrian Water Ltd during the Examination, including through the offers of meetings described above and the provision of the KML file. The Applicant considers that its consultation and engagement programme has been adequate and proportionate and urges Northumbrian Water Ltd to engage constructively with the outstanding offers.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

218. AP 218 - Julie Russell on behalf of National Highways Limited

218.1 Person with Interest in Land (PIL) Reference ID: 10201

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Overview of NH's Objection 1.1 NH objects to the compulsory acquisition ("CA") and temporary possession ("TP") powers sought over approximately 154 plots of land owned or occupied by NH for the purposes of its statutory undertaking as strategic highway authority. NH's core submission is that the inclusion of these plots in the Book of Reference is neither necessary nor proportionate, and that the statutory tests for authorising compulsory acquisition are not met. 2. Overview of NH's Objection 2.1 Under section 122 of the Planning Act 2008, an order granting development consent may include provision authorising compulsory acquisition of land only if the Secretary of State is satisfied that the land is (a) required for the development to which the development consent relates, (b) required to facilitate or is incidental to that development, or (c) replacement land given in exchange. Under	Summary of Objection The Applicant understands that National Highways Limited holds interests in land within the Project Order Limits by way of freehold, occupation and easement right or privilege. The objection raised by National Highways concerns, in summary: the compulsory acquisition powers sought by the Applicant in relation to land within the Strategic Road Network ("SRN"); the appropriateness of the Class 1 compulsory acquisition powers sought; the assertion that rights for new apparatus within the SRN should be obtained under the New Roads and Street Works Act 1991 ("NRSWA") rather than under the DCO; and concerns about the proportionality of the land rights sought. Land Rights Sought The Applicant is seeking to acquire both Class 1 interests in the SRN and the following permanent rights for National Grid over land in which National Highways holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). Consolidated Response At Compulsory Acquisition Hearing 3 ("CAH3"), the Applicant confirmed to the Examining Authority that it does not need to acquire land within the adopted highway boundary of within the Strategic Road Network. The Applicant notes that any Class 1 compulsory acquisition within the SRN would only be exercised with the consent of National Highways in accordance with the Protective Provisions. In relation to the NRSWA point, the Applicant maintains that rights for maintenance under the NRSWA do not constitute an appropriate land rights regime for Nationally Significant

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
section 123, there must be a compelling case in the public interest for the land to be acquired compulsorily, taking into account the availability of alternatives and proportionality. 2.2 The DCLG Guidance (September 2013) elaborates on these tests, emphasising that the applicant must demonstrate that the land sought is necessary (i.e., no more land is included than is reasonably required) and that the proposed interference is proportionate to the objectives of the scheme. 3. NH's Specific Grounds of Objection 3.1 Compulsory Acquisition of Operational Land is Not Necessary 3.1.1 NH submits that the plots in question constitute operational land acquired for the purpose of maintaining its statutory undertaking. NH identifies that the permanent land take plots fall into two principal categories: (cid:31) Land which is currently NH-managed highway and is required for highway works to the Strategic Road Network ("SRN") or widening works as part of the Applicant's proposals. Such works are already authorised by the DCO subject to protective provisions, and therefore CA is unnecessary. (cid:31) Land which is not highway but is owned by NH and is required for SRN widening as part of the Applicant's proposals.	Infrastructure Projects ("NSIPs"). The Applicant further notes that, in line with NPS EN-5, permanent rights for NSIPs are strongly preferred over reliance on statutory undertaker rights under NRSWA. The Applicant is continuing to engage with National Highways to progress the matters raised and to reach agreement on the land rights required. In any event, irrespective over oversail or undersail of the Highway, CA of rights powers will not have a serious detriment on the operation of the SRN because the Applicant is required under the terms of the Protective Provisions to comply with all of National Highways consent processes, sign offs and road space booking processes under the dDCO, the Protective Provisions and NRSWA before working over or under the SRN. The Applicant contends that there is no serious detriment to NH and will address this in their s127/138 submission should the parties not resolve all outstanding issues. In relation to National Highways' specific submission regarding detrunked highway land, the Applicant notes the position advanced by National Highways that certain plots over which rights are sought comprise former trunk road land which has been transferred to the relevant local highway authority, although the transfer is not yet reflected in Land Registry records. The Applicant is reviewing the position in respect of the affected plots with National Highways and the relevant local authority. Should National Highways retain any legal interest in the land concerned, the Applicant remains willing to secure any necessary rights or interests by agreement where reasonably practicable. However, pending confirmation of the legal position and resolution of all affected interests, the Applicant considers it appropriate to retain the relevant powers within the Order as a proportionate fall-back position to ensure delivery of the Proposed Development if voluntary arrangements cannot be concluded. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
This land does not need to be acquired only to be transferred back to NH; access can be granted through protective provisions and by agreement. 3.1.2 NH contends that there is no need for plots in either category to be compulsorily acquired, as they are either already part of the SRN or land that will become part of the new SRN. Their inclusion in the Book of Reference is therefore not necessary or proportionate as required by the Planning Act CA Guidance. 3.2 Acquisition of Rights is Not Necessary 3.2.1 Regarding the acquisition of rights (principally for overhead lines and underground cabling), NH submits that the majority of plots relate to operational highway forming part of the SRN. NH argues that rights are not in fact required because National Grid already possesses statutory powers under the New Roads and Street Works Act 1991 to install, maintain, and repair apparatus in a public highway, with section 105 of that Act confirming that references to "in" a highway include works under, over, across, along or upon it. Accordingly, National Grid can undertake overhead line works without CA, and the inclusion of these plots is again not necessary or proportionate as required by the CA Guidance. 3.2.2 Where an underground cable may require an easement, NH is prepared to grant	Compulsory Acquisition Hearing 1 [REP1-138] are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
that easement by consent and is willing to negotiate terms, further obviating the need for compulsory powers. 3.2.3 Discussions with the Applicant as to the appropriateness of the utilising the powers in the New Roads and Street Works Act 1991 are on going. NH hope to be in a position to provide an update in the above regard at CAH3 which is due to be held on 24 June. 3.3 Section 127: Serious Detriment to the Undertaking 3.3.1 NH also relies on section 127 of the Planning Act 2008, which provides that an order granting development consent may only include provision authorising the CA of statutory undertakers' land to the extent that the Secretary of State is satisfied that the land can be purchased and not replaced without serious detriment to the carrying on of the undertaking, or can be replaced without such detriment. NH submits that if its operational land were compulsorily acquired, it could cause serious detriment to the safe and efficient operation of the SRN, as NH needs to remain in control of its highway and subsoil. 3.4 Historic Ownership Plots 3.4.1 NH notes that certain plots where rights are sought relate to roads that have been detrunked, meaning ownership has in fact passed to the local authority but the transfer has not been registered at the Land Registry. As this land is non-operational, NH can agree	is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees and refers to [REP3-010] and [REP1-138] as set out in full in earlier responses above. Similar assertions regarding Section 123 are also rejected, and the Applicant is satisfied it has acted in full accordance with the MHCLG 2013 Guidance.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

to transfer any interest it retains by agreement, and CA is therefore not necessary.

4. Summary and Conclusion

4.1 In essence, NH's objection rests on the proposition that the tests of necessity and proportionality under sections 122 and 123 of the Planning Act 2008 and the DCLG

Guidance are not satisfied, because the Applicant can achieve its objectives without compulsory acquisition — either through existing statutory powers, protective provisions, or voluntary agreement.

Additionally, the serious detriment test under section 127 presents a further barrier to the acquisition of NH's operational land.

219. AP 219 - Rosemary Carol Thomson

219.1 Person with Interest in Land (PIL) Reference ID: 7272

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Report on Objections to the Norwich to Tilbury (N2T) Scheme under Sections 122 and 123 of the Planning Act 2008 1. Introduction This report summarises the principal objections to the proposed National Grid Norwich to Tilbury (N2T) transmission scheme, with particular regard to the statutory tests governing compulsory acquisition under sections 122 and 123 of the Planning Act 2008. These provisions require that: • There must be a compelling case in the public interest for compulsory acquisition. • The land or rights sought must be necessary for the development. • The Secretary of State must be satisfied that the purposes for which the land is acquired justify the interference with private rights, including under human rights legislation. Drawing upon the submitted objection materials, including landowner representations and professional advice, this report identifies key grounds upon which the	Summary of Objection The Applicant understands that Rosemary Carol Thomson holds interests in land within the Project Order Limits by way of freehold, occupation and easement right or privilege. The objection raised by this Affected Person concerns, in summary: the compulsory acquisition and temporary possession powers sought by the Applicant; the necessity and proportionality of the rights sought; concerns about the extent of land affected and the ability to reduce the land in the Heads of Terms; concerns about the impact of construction access on the highway; the impact of the Project on agricultural operations; and the assertion that the Applicant has not adequately considered reasonable alternatives. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Some plots fall within Class 8 (white land), in respect of which no compulsory acquisition or temporary possession powers are sought. Consolidated Response Version 2 of the Heads of Terms was issued to this Affected Person on 9th April 2026. Dialogue with this Affected Person's agent (Simon Gilbey) is ongoing. The most recent meeting took place on 12th May 2026 to discuss accommodation works, terms and severed

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: • Severe disruption to farming operations • Safety risks arising from construction routes • Loss of residential amenity • Interference with existing infrastructure and utilities • Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition 3.1 Lack of Necessity for Specific Land Interests	areas. A further meeting was requested on 4th June 2026 with the agent to discuss the possibility of reducing the extent of land included in the Heads of Terms, and the Applicant is currently awaiting a response to that request. In relation to construction access, site access has been designed to meet highway standards and a Stage 1 Road Safety Audit has been undertaken and haul roads have been routed to allow for safe highway access, including appropriate bellmouth arrangements. A summary of all Road Safety Audits undertaken are provided in 7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]. In relation to the alternatives concern raised, the Applicant refers to the thematic response below. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant

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Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: - National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. - Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, - haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and - the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice. Key examples include:	will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant can confirm we are not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). Habitat creation and enhancement will be delivered within Environmental Areas, which are multi-functional areas within the Order Limits, where standard and embedded mitigation (such as landscape and visual mitigation) will be delivered alongside biodiversity gains. Any BNG deficit determined following detailed design will be delivered offsite through registered BNG providers. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the

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• Permanent disruption of agricultural land where temporary access could achieve the same objective • Overly wide or intrusive haul roads • Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: • The scheme imposes significant and concentrated burdens on specific landowners and communities • These burdens are not adequately mitigated or justified by the chosen route • The same strategic objectives could be achieved through less harmful alternatives As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined.	Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees and refers to [REP3-010] and [REP1-138] as set out above. The Applicant similarly disagrees with any assertion that the Section 123 test or the MHCLG 2013 Guidance requirements have not been met, for the reasons given in earlier responses. In relation to the impact on agricultural operations, the Applicant acknowledges that the Project will have an impact on agricultural land in which this Affected Person holds an interest during the construction phase, as detailed in Environmental Statement Chapter 6 - Agriculture and Soils [Revision B], which confirms the amount of agricultural land to be temporarily and permanently impacted. The Applicant is committed to the responsible handling of soils in accordance with the requirements of the Code of Construction Practice and the relevant soil handling guidance. The Applicant also commits to reinstating agricultural land following construction to its pre-construction condition (which would include pre-construction ALC grade), and the condition required for the end-use, as detailed in .2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines,

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4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: • A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors • Use of existing redundant pylon routes instead of constructing entirely new infrastructure • Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for infrastructure development. Specific concerns include:	telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP 357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP122, 2024 in APP-359 and 2023 in APP-358]. In relation to the construction works impacts raised by this Affected Person, the Applicant acknowledges that construction activities will cause some temporary disruption and

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• Residential impact: properties becoming unlettable due to proximity to haul roads • Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access • Community disruption: interference with footpaths, local routes, and daily activities • Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment • Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that: • The consultation process fell short of statutory requirements	inconvenience to affected landowners. The Applicant is committed to managing construction impacts in accordance with the Code of Construction Practice and other embedded mitigation measures. The Applicant will work proactively with affected landowners and occupiers, including this Affected Person, to provide appropriate advance notice of works, to agree working methodologies where required, and to minimise disruption to ongoing land uses so far as is reasonably practicable. Any residual loss or damage arising from the exercise of temporary possession powers will be addressed through the statutory compensation regime. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

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- There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts
- Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO)

If established, these deficiencies could mean that:

- The Secretary of State cannot be satisfied that all relevant considerations have been taken into account
- The statutory tests under sections 122 and 123 cannot properly be met

6. Failure to Engage and Negotiate

Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers.

However, the evidence suggests:

- Negotiations have been ongoing for several years without resolution
- Landowners have not been provided with final or clear terms
- NG will not engage with landowners suggestions of even minor changes/ameliorations

Please summarise (in no more than 1500 words) the reason(s) for your objection

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- The promoter continues to revise fundamental aspects such as the basis of compensation claims

This raises concerns that:

- Compulsory acquisition powers are being used prematurely
- The statutory expectation of meaningful negotiation has not been fulfilled

Such failures weigh against the existence of a compelling case in the public interest.

7. Deliverability and Design Concerns

Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including:

- Insufficient detail on infrastructure such as bridges across flood-prone areas
- Construction proposals that are impractical or unsafe
- Lack of clarity on how temporary works would be implemented and restored

Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it.

8. Application of Sections 122 and 123

Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests:

Section 122 (Necessity)

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- Land and rights are broader than required
- Alternatives exist that would reduce land-take
- The scheme has not been optimised to minimise interference

Section 123 (Compelling Case in the Public Interest)

- Impacts on landowners are severe and disproportionate
- Consultation and alternatives analysis are inadequate
- Negotiation efforts have been insufficient
- The balance between public benefit and private harm is not properly justified

9. Conclusion

In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008.

The evidence indicates that:

- The extent of compulsory acquisition is not fully justified
- Less intrusive alternatives have not been adequately considered
- The impacts on affected landowners and communities are excessive

Please summarise (in no more than 1500 words) the reason(s) for your objection

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- Procedural shortcomings undermine confidence in the scheme

Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met.

To proceed lawfully, National Grid need to:

- Demonstrate genuine optimisation of the route and access arrangements
- Provide clear evidence of alternatives being properly assessed
- Engage meaningfully with affected parties
- Ensure that land acquisition is strictly limited to what is necessary

Absent such steps, the justification for compulsory powers remains open to significant challenge.

220. AP 220 - Christopher Edward Broom

220.1 Person with Interest in Land (PIL) Reference ID: 20000

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representations and professional advice, this report identifies key grounds upon which the scheme, as currently promoted, fails to satisfy these statutory requirements. 2. Overview of the Proposed Scheme and Impacts The N2T scheme proposes a new overhead electricity transmission line between Norwich and Tilbury, including extensive new pylons, access routes, compounds, and associated infrastructure across rural landholdings. Objections focus not only on the principle of the scheme but, more significantly, on its detailed alignment, the extent of land taken, and the manner in which works would be carried out. The evidence demonstrates that the impacts extend beyond land-take to include: • Severe disruption to farming operations • Safety risks arising from construction routes • Loss of residential amenity • Interference with existing infrastructure and utilities • Long-term landscape and environmental harm These matters must be assessed against the strict statutory tests in sections 122 and 123. 3. Section 122: Necessity and Scope of Compulsory Acquisition	including appropriate bellmouth arrangements. A summary of all Road Safety Audits undertaken are provided in 7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]. The Applicant's engineering team continues to review these matters and remains open to discussing site-specific access solutions with this Affected Person's agent. In relation to the alternatives concern raised, the Applicant refers to its thematic response below. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

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3.1 Lack of Necessity for Specific Land Interests Section 122(2) requires that land be acquired only if it is necessary for the development. While the overarching project may be justified, there is a strong argument that the extent of land and rights proposed exceeds what is reasonably required. The objections identify that: - National Grid may be able to justify the project in principle, but not the specific land parcels or access arrangements proposed. - Certain areas appear to be included for flexibility or convenience rather than strict necessity. This is especially evident in relation to, - haul roads and access routes, where alternative alignments exist that would reduce impact without compromising deliverability, and - the extent of land which National Grid are seeking to acquire under the DCO for the provision of environmental mitigation and BNG. 3.2 Excessive and Disproportionate Rights A further issue arises where the scheme seeks permanent acquisition or extensive rights where temporary or limited rights would suffice.	The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant can confirm we are not pursuing land rights specifically to facilitate Biodiversity Net Gain (BNG). Habitat creation and enhancement will be delivered within Environmental Areas, which are multi-functional areas within the Order Limits, where standard and embedded mitigation (such as landscape and visual mitigation) will be delivered alongside biodiversity gains. Any BNG deficit determined following detailed design will be delivered offsite through registered BNG providers. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory

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Key examples include: • Permanent disruption of agricultural land where temporary access could achieve the same objective • Overly wide or intrusive haul roads • Interference with established access routes and farm operations The evidence suggests that National Grid has failed to minimise land-take and rights, contrary to the requirements of proportionality embedded in section 122 and associated guidance. 4. Section 123: Compelling Case in the Public Interest 4.1 Failure to Demonstrate a Compelling Case at a Local Level While national energy infrastructure may serve a broad public interest, section 123 requires a balanced assessment of public benefit against private harm. Objectors argue that: • The scheme imposes significant and concentrated burdens on specific landowners and communities • These burdens are not adequately mitigated or justified by the chosen route • The same strategic objectives could be achieved through less harmful alternatives	compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written

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As such, the case for compulsory acquisition is weakened where less intrusive options have not been properly examined. 4.2 Inadequate Consideration of Alternatives A critical requirement in demonstrating a compelling case is the proper evaluation of alternatives. The objections provide substantial evidence that this has not been adequately carried out. Examples include: • A proposed offshore cable route from North Norfolk to Tilbury or Bradwell, utilising existing infrastructure corridors • Use of existing redundant pylon routes instead of constructing entirely new infrastructure • Multiple alternative haul road alignments that would reduce disruption to residents and farming operations Despite representations made during earlier rounds of both non-statutory and statutory consultations, it appears that National Grid has not sufficiently engaged with or incorporated alternative proposals put forward in many cases. This failure directly undermines the statutory justification for compulsory acquisition. 4.3 Disproportionate Impact on Landowners and Communities The scheme's impacts go well beyond what might reasonably be expected for	Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. In relation to the impact on agricultural operations raised by this Affected Person, the Applicant acknowledges that the Project will have an impact on agricultural land during the construction phase. The Applicant's approach to agricultural impacts has been assessed in

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
infrastructure development. Specific concerns include: • Residential impact: properties becoming unlettable due to proximity to haul roads • Safety risks: dangerous junctions and high-speed traffic conflicts created by construction access • Community disruption: interference with footpaths, local routes, and daily activities • Agricultural harm: loss of productivity due to field fragmentation and obstruction of modern farming equipment Large scale expensive destructive and long term costs when affected landholders seek to reorganise the hedges, trees and tracks on the farms to enable existing farming operations to continue on the land holdings For example, placing a haul road through the centre of a large field will prevent the use of large scale machinery and require a complete redesign of drainage systems. Such impacts suggest a failure to strike a fair balance, a key requirement under both section 123 and human rights law. 5. Procedural and Consultation Deficiencies A further significant objection concerns the adequacy of the pre-application consultation process. Evidence indicates that:	the Environmental Statement, in particular in 6.13 Environmental Statement Chapter 13 – Land Use, Agriculture and Soils [Revision B]. The Applicant is committed to responsible handling of soils in accordance with 7.2 Outline Code of Construction Practice [Revision G] and relevant soil handling guidance. Agricultural land will be reinstated following construction to its pre-construction condition (which would include pre-construction ALC grade), and the condition required for the end-use, and the Applicant remains committed to engaging with this Affected Person to agree the detail of soil management and reinstatement works, as detailed in Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D]. Financial losses arising from disruption to agricultural operations during construction are addressed through the statutory compensation regime. A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• The consultation process fell short of statutory requirements • There were methodological and procedural errors in key assessments, including landscape, heritage, and environmental impacts • Professional and legal opinions (including from senior counsel) conclude that the process is insufficient to support a Development Consent Order (DCO) If established, these deficiencies could mean that: • The Secretary of State cannot be satisfied that all relevant considerations have been taken into account • The statutory tests under sections 122 and 123 cannot properly be met 6. Failure to Engage and Negotiate Guidance under the Planning Act 2008 requires that promoters make reasonable efforts to acquire land by agreement before resorting to compulsory powers. However, the evidence suggests: • Negotiations have been ongoing for several years without resolution • Landowners have not been provided with final or clear terms • NG will not engage with landowners suggestions of even minor changes/ameliorations	National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP122, 2024 in APP-359 and 2023 in APP-358]. In relation to the construction works impacts raised by this Affected Person, the Applicant acknowledges that construction activities will cause some temporary disruption and inconvenience to affected landowners. The Applicant is committed to managing construction impacts in accordance with the Code of Construction Practice and other embedded mitigation measures. The Applicant will work proactively with this Affected Person to provide appropriate advance notice of works, to agree working methodologies where required, and to minimise disruption to ongoing land uses so far as is reasonably practicable. Any residual loss or damage arising from the exercise of temporary possession powers will be addressed through the statutory compensation regime. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
- The promoter continues to revise fundamental aspects such as the basis of compensation claims This raises concerns that: - Compulsory acquisition powers are being used prematurely - The statutory expectation of meaningful negotiation has not been fulfilled Such failures weigh against the existence of a compelling case in the public interest. 7. Deliverability and Design Concerns Although not the central objection, there are also questions regarding the practical deliverability of the scheme as designed, including: - Insufficient detail on infrastructure such as bridges across flood-prone areas - Construction proposals that are impractical or unsafe - Lack of clarity on how temporary works would be implemented and restored Where a scheme is not clearly deliverable, it becomes difficult to justify the compulsory acquisition of land to facilitate it. 8. Application of Sections 122 and 123 Bringing these issues together, the objections demonstrate multiple areas where the scheme fails to meet the statutory tests: Section 122 (Necessity)	Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138], in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

- Land and rights are broader than required
- Alternatives exist that would reduce land-take
- The scheme has not been optimised to minimise interference The scheme has not been optimised to minimise interference

Section 123 (Compelling Case in the Public Interest)

- Impacts on landowners are severe and disproportionate
- Consultation and alternatives analysis are inadequate
- Negotiation efforts have been insufficient
- The balance between public benefit and private harm is not properly justified

Accordingly, there is a credible and substantive basis for objection, and a strong argument that the statutory tests for compulsory acquisition have not yet been met.

To proceed lawfully, National Grid need to:

- Demonstrate genuine optimisation of the route and access arrangements
- Provide clear evidence of alternatives being properly assessed
- Engage meaningfully with affected parties
- Ensure that land acquisition is strictly limited to what is necessary

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Absent such steps, the justification for compulsory powers remains open to significant challenge.

9. Conclusion

In conclusion, while the strategic need for electricity transmission infrastructure may be accepted, the Norwich to Tilbury scheme—particularly in its current form—raises serious legal and planning concerns under sections 122 and 123 of the Planning Act 2008.

The evidence indicates that:

- The extent of compulsory acquisition is not fully justified
- Less intrusive alternatives have not been adequately considered
- The impacts on affected landowners and communities are excessive
- Procedural shortcomings undermine confidence in the scheme

221. AP 221 - Vicky Fowler on behalf of Bloor Homes Limited

221.1 Person with Interest in Land (PIL) Reference ID: 10163

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The current scope of Bloor Homes objection relates to land parcels at Chadwell St Mary. In particular plots 6/71, 6/71a and 6/71b. Bloor has an option over this land and is promoting a planning application for the development of up to 1,500 dwellings, together with education, health and retail uses. The land forms part of a growth area proposed by Thurrock Borough Council for the delivery of up to 4,000 homes, and plays a key role in meeting the Borough's housing delivery targets. The Bloor scheme will be delivered in phases and start on site is anticipated in 2029. Taking the parcels in turn: Land Parcel 6/71a: This is a strip of land adjacent to Brentwood Road (coloured brown and referenced 6/71a in the Land Plans). NGET is proposing a compulsory acquisition of this land to provide its temporary and permanent access. This strip of land will be fundamental to the Bloor scheme as it will contain the proposed access to residential development parcels off Brentwood Road and overlaps with the first	Summary of Objection Bloor Homes Limited's (Bloor Homes) objection concerns land parcels at Chadwell St Mary, in particular plots 6/71, 6/71a and 6/71b, over which Bloor Homes holds an option and is promoting a planning application for up to 1,500 dwellings together with education, health and retail uses. The land forms part of a growth area identified by Thurrock Borough Council for delivery of up to 4,000 homes. Plot 6/71a is a strip of land adjacent to Brentwood Road proposed to be compulsorily acquired for temporary and permanent access, which Bloor Homes considers to be excessively wide and fundamental to its residential scheme. In respect of plots 6/71 and 6/71b, Bloor Homes contends that full acquisition would have very significant adverse consequences for the scheme. Bloor Homes' position is that compulsory acquisition is not necessary and that land could be retained with rights granted as required. The Statement of Common Ground (SoCG) submitted at Deadline 1 [REP1-083] records agreement on a number of key matters, including that the Applicant will only implement land and property rights to the extent actually required, that the permanent access route can be varied through the Bloor Homes scheme, and a commitment to explore opportunities for shared facilities. Bloor Homes objects to CA and TP powers to the extent they are not reduced in size, changed to temporary, or regulated by a binding legal agreement. Bloor Homes wishes to see the land plans amended, the permanent overhead line located as far north in the site as possible, and the SoCG commitments secured by way of a legal agreement. Heads of Terms for such an agreement have been received and negotiation of the agreement is expected to be finalised by the close of examination. Land Rights Sought The Applicant understands that Bloor Homes holds an interest in the form of an Easement Right or Privilege within the Project Order Limits. The Applicant is seeking to permanently

Please summarise (in no more than 1500 words) the reason(s) for your objection

area for development adjacent to the site entrance. This strip is excessively wide. Bloor has sought comfort that NGET will not require the full extent of this land and was hoping for the land plans to be scaled back. Bloor have also sought comfort that it will be able to construct the permanent access and lay services as required and commence building within Area A as shown on the plan appended to the Statement of Common Ground submitted at deadline 1 **[REP1-083]**.

Land Parcels 6/71 and 6/71b Bloor has concerns regarding the other land coloured brown on the Land Plans, including parcels 6/71 and 6/71b. Should these be fully acquired by NGET, this would have very significant adverse consequences for the Bloor scheme.

It is Bloor's understanding, through discussions with NGET, that a relatively small proportion of the brown land is actually required for For all 3 parcels, it is Bloor's view that compulsory acquisition is not necessary, and instead Bloor (or the landowner ahead of Bloor's acquisition) could retain the land and grant NGET rights as necessary. Moreover, permanent access to NG apparatus ought to be capable of taking place over the estate roads once constructed.

Negotiations with the Applicant have been positive and the dropping of option A is helpful to Bloor. The Statement of Common Ground

Applicant's Response

acquire land (Class 1 – Compulsory Acquisition of Land) in which Bloor Homes holds an interest (Option). The Applicant is also seeking to acquire the following permanent rights over land in which Bloor Homes holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 3 (underground cable infrastructure); (c) Class 5 (access); and (d) Class 6 (drainage infrastructure). Powers of temporary possession (Class 7) are also sought for the Applicant in connection with the Project over land in which Bloor Homes holds an interest. Certain parcels of land in which Bloor Homes holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

Specific Response

The Applicant notes that at this stage Bloor Homes have not submitted their planning application and do not have a deliverable consent. Much of the potential interaction is expected to be mitigated in practice through the timing of each party's respective works.

As noted by Bloor Homes, the direct interaction has been reduced by the adoption of Scenario B, with the crossing of LTC to be achieved by underground cable. This has reduced the extent of the permanent diversion of existing overhead lines and also the extent of the temporary diversion required.

The Applicant and Bloor Homes have progressed beyond heads of terms and negotiations are continuing over the full draft of the legal agreement. The terms of the legal agreement are substantially agreed, and the Applicant shares Bloor Homes' aim of completing the agreement before the close of the Examination.

The legal agreement builds on the principles that were first documented in the Statement of Common Ground submitted at Deadline 1 **[REP1-083]**, reflecting the progress made in further discussions between the Applicant and Bloor Homes. Amongst other things, it includes a set of agreed principles for developing temporary and permanent access arrangements, which includes a mechanism for the Applicant to connect into, and make use of, the estate roads (once constructed) to access its apparatus for operational and maintenance purposes and thereafter release/reduce the extent of permanent rights otherwise taken over the Bloor Homes scheme land.

Until a detailed design solution accommodating both the Applicant and Bloor Homes' access requirements is settled, the Applicant cannot reduce the extent of the temporary possession

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
("SoCG"), submitted at deadline 1, records agreement on several key matters, including: • that NGET will only implement land and property rights to the extent actually required; • that the NGET permanent access route can be varied to be routed through the Bloor Scheme; • the broad location for a construction access preferred by both parties to the north of the main access to the residential development; an understanding that restrictions on built development in certain areas are not intended to prevent Bloor's enabling works; and a commitment to exploring opportunities for shared facilities and materials. Bloor objects to both the compulsory acquisition ("CA") and temporary possession ("TP") powers sought by NGET in respect of the Bloor Scheme land, to the extent that these are not reduced in size, changed to temporary or regulated by a binding legal agreement to reflect the commitments given. Bloor would still like to see the land plans amended and a commitment to locate the permanent overhead line as far north in the site as possible. Importantly the commitments set out in the SoCG need to be secured in a legal agreement. Bloor have received heads of terms for such an agreement and	and compulsory possession powers sought under the 3.1 Draft Development Consent Order [Revision G]. However, the Applicant has agreed within the heads of terms that it will seek to avoid key initial development areas within the Bloor Homes proposals. Discussions are ongoing to ascertain whether the Applicant can agree to stand off further parts of Bloor Homes' proposed development site. <u>Thematic Response</u> Regarding Bloor Homes' objection to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"), the Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
understand that the negotiation of the agreement will progress with the aim of completing the same during the Examination. Taken at face value, the Land Plans suggest a fundamental constraint to the Bloor scheme and if the permanent acquisition was simply exercised without regard to the agreed matters then that would remove the access to a strategic housing site.	The Applicant notes that Bloor Homes have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

222. AP 222 - Claire Lincoln-White

222.1 Person with Interest in Land (PIL) Reference ID: 2859

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We own the freehold on Brittons Hall Farm, a residential property situated on Mashbury Road. The property is situated next to a field which is planned by NG for the situation of a pylon and a crossing point for the haul road. There are F-6/40/46/47/49/50/54. We met with representatives of the applicants agents on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure and access to the property but have not received a response. With no response, the applicant has so far failed to provide any justification for temporary right nor seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives and has failed to explain how the rights over the land will be used (Guidance para 9). In addition, the applicant has not explained why there needs to be access at night and failed to	Summary of Objection Claire Lincoln-White owns the freehold of Brittons Hall Farm, a residential property on Mashbury Road, which is situated adjacent to a field where National Grid proposes to site a pylon and a haul road crossing point, affecting plots F-6/40, 46, 47, 49, 50 and 54. The AP has met with the Applicant's agents on multiple occasions, requesting explanations of the justification for the proposed acquisition, details of intended works within the plots, and what consideration has been given to implications for existing infrastructure and access. No satisfactory responses have been received. Specific unresolved concerns include: (1) the boundary between the garden and field (where the haul road is to be built) is unclear, and the shaded option area may include land not belonging to the property; (2) the purpose of acquiring the garden, even on a temporary basis, is unclear — the haul road is not being built on it and it contains mature trees and hedges providing habitat, security and privacy; (3) it is unclear whether current access to the property will be impacted; (4) no provisions have been explained for security during works, or whether access will be granted at night; (5) the impact on overhead and telecom lines is unclear; and (6) the AP relies on non-fibre WiFi delivered via antenna and is concerned about interference from electricity pylons. The AP contends that the proposed rights constitute a disproportionate and severe infringement of rights under Articles 1 and 8 of the ECHR. Land Rights Sought The Applicant understands that this AP holds a Freehold and Occupation interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 3 (underground cable infrastructure); and (c) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
explain how our property will remain safe, secure and private. Specific concerns which have not been responded to by the applicant are: 1) the boundary of the garden and the field onto which the haul road will be build is not clear. The option area shaded seems to include part of the field which does not belong to the property. 2) the purpose of acquiring the garden is not clear, even on a temporary basis. The haul road is not being built on it. There are mature trees and hedges at the end of this section backing onto the field where the haul road will be situated and onto Mashbury Road. This provides not only habitats for wildlife but also security and privacy for the property. Fisher German have said they are not clear what this land will be intended to be used for but speculated it is for visibility for traffic from the haul road crossing Mashbury Road. We have asked why they cannot consider traffic lights or moving the haul road slightly further away from the boundary of the property into the field which is already impacted as alternatives to negate the need for the acquisition and destruction on boundary trees/hedges. 3) It is not clear whether current access to the property will be impacted by proposed acquisitions. 4) Asked what provisions they will make to ensure our property is kept safe and secure if	following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure); and (b) Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The Applicant confirms that negotiations in respect of this landholding are being led by Matthew Johnson of Fisher German. Heads of Terms Version 1 were issued in October 2025, and a Heads of Terms meeting was subsequently held with the agent on 4th December 2025 to discuss compensation for the residential property in the form of injurious affection and the potential for relocating the tower to avoid encroachment of works on the property. The main concerns raised by the AP are the devaluation of the property and visual impact, both of which are being actively addressed in negotiations. Temporary loss of hedgerows will be required to facilitate the construction of the Project. Micro-siting at the detailed design stage will seek to minimise impacts on hedgerows wherever practicable as detailed within 7.4 Outline Landscape and Ecological Management Plan [Revision G] and secured through commitment B13 of 7.2 Outline Code of Construction Practice [Revision G]. Some plots refer to a section of public highway which the Applicant is seeking rights to apply a highway visibility splay over to ensure safe design of vehicular crossover bellmouths for the haul road. The extents of the Order Limits have been drawn to Highway Ownership Boundary based on OS data. Where existing hedgerows or trees impact on the proposed visibility splay, these will to be cut back or removed in order to provide a highways compliant access. An example of this might be that they overhang in to the public highway, these would be cut back to the extents that the Highway Authority owns. It should be noted that there is a level of discrepancy between the land registry plans, OS data and the highways ownership boundary, which may result in this landowner inadvertently becoming affected. However as outlined the Applicant does not plan to access private gardens or remove vegetation within someone's private garden. Where temporary hedgerow loss is required to facilitate the Project, hedgerows will be reinstated to their original condition as detailed Section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision G]. In relation to the AP's concerns regarding potential interference with the aerial WiFi connection, some APs have questioned whether

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
work goes ahead and if access is granted during the day or night. 5) It is not clear how overhead lines / telecom lines will be impacted and where they will occupy air space in and around the property or whether they are likely to be buried underground. 6) We rely on non-fibre wifi which is delivered via antenna on our property. Electricity pylons and overhead lines can interfere with this and we've asked for how this would be addressed. The applicant has said the plots 'may be affected' but cannot explain how, have not considered alternatives and have failed to outline how our property (and its occupants) would remain safe, secure and have privacy during any works and afterwards, where applicable. This strongly indicates the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient, and have insufficiently considered why permanent / temporary access is required at all, particularly in relation to the garden. In respect of the primary access, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control land close to the access to the property in perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent and temporary rights sought, constitute a	the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report [REP3-034] and would present no issues for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited

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disproportionate and severe infringement of our rights under Articles 1 and 8 of the ECHR and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.	to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

In respect of the AP's human rights concerns, the Applicant refers to 4.1 Statement of Reasons and 8.1 The Protected Rights.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

223. AP 223 - Richard White

223.1 Person with Interest in Land (PIL) Reference ID: 8024

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We own the freehold on Brittons Hall Farm, a residential property situated on Mashbury Road. The property is situated next to a field which is planned by NG for the situation of a pylon and a crossing point for the haul road. There are F-6/40/46/47/49/50/54. We met with representatives of the applicants agents on multiple occasions. As part of those meetings we asked for explanations of the justification for the proposed acquisition, details of any work that would be done within the plots and what considerations were given to the implications for existing infrastructure and access to the property but have not received a response. With no response, the applicant has so far failed to provide any justification for temporary right nor seeking permanent rights over the affected land (Planning Act s. 122 and Guidance paras 5-7), has not provided us with an opportunity to consider any reasonable alternatives and has failed to explain how the rights over the land will be used (Guidance para 9). In addition, the applicant has not explained why there needs to be access at night and failed	Summary of Objection Richard White is a co-owner of the freehold of Brittons Hall Farm, a residential property on Mashbury Road. This AP's objection is made jointly with Claire Lincoln-White and concerns the same property. The AP has met with the Applicant's agents on multiple occasions requesting justification for the acquisition, details of intended works, and the implications for the property's existing infrastructure and access. The specific concerns raised are identical to those of Claire Lincoln-White (AP 222) and include: the unclear boundary between the garden and the field on which the haul road will be built; the purpose of acquiring the garden on either a temporary or permanent basis; whether existing access to the property will be affected; security provisions during works; the position of overhead and telecom lines; and interference with the non-fibre WiFi antenna. The AP contends that the permanent rights sought under Class 4(a)-(d) and the combined effect of permanent and temporary rights sought constitute a disproportionate and severe infringement of rights under Articles 1 and 8 of the ECHR. Land Rights Sought The Applicant understands that this AP holds a Freehold and Occupation interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 3 (underground cable infrastructure); and (c) Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure); and (b) Class 4 (overhead line and underground cable infrastructure). Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Please summarise (in no more than 1500 words) the reason(s) for your objection

to explain how our property will remain safe, secure and private.

Specific concerns which have not been responded to by the applicant are:

- 1) the boundary of the garden and the field onto which the haul road will be build is not clear. The option area shaded seems to include part of the field which does not belong to the property.
- 2) the purpose of acquiring the garden is not clear, even on a temporary basis. The haul road is not being built on it. There are mature trees and hedges at the end of this section backing onto the field where the haul road will be situated and onto Mashbury Road. This provides not only habitats for wildlife but also security and privacy for the property. Fisher German have said they are not clear what this land will be intended to be used for but speculated it is for visibility for traffic from the haul road crossing Mashbury Road. We have asked why they cannot consider traffic lights or moving the haul road slightly further away from the boundary of the property into the field which is already impacted as alternatives to negate the need for the acquisition and destruction on boundary trees/hedges.
- 3) It is not clear whether current access to the property will be impacted by proposed acquisitions.

Applicant's Response

Consolidated Response

The Applicant confirms that negotiations in respect of this landholding are being led by Matthew Johnson of Fisher German. Heads of Terms Version 1 were issued in October 2025, and a Heads of Terms meeting was subsequently held with the agent on 4th December 2025 to discuss compensation for the residential property in the form of injurious affection and the potential for relocating the tower to avoid encroachment of works on the property. The main concerns raised by the AP are the devaluation of the property and visual impact.

Temporary loss of hedgerows will be required to facilitate the construction of the Project. Micro-siting at the detailed design stage will seek to minimise impacts on hedgerows wherever practicable as detailed within 7.4 Outline Landscape and Ecological Management Plan **[Revision G]** and secured through commitment B13 of 7.2 Outline Code of Construction Practice **[Revision G]**.

Some plots refer to a section of public highway which the Applicant is seeking rights to apply a highway visibility splay over to ensure safe design of vehicular crossover bellmouths for the haul road. The extents of the Order Limits have been drawn to Highway Ownership Boundary based on OS data. Where existing hedgerows or trees impact on the proposed visibility splay, these will to be cut back or removed in order to provide a highways compliant access. An example of this might be that they overhang in to the public highway, these would be cut back to the extents that the Highway Authority owns. It should be noted that there is a level of discrepancy between the land registry plans, OS data and the highways ownership boundary, which may result in this landowner inadvertently becoming affected. However as outlined the Applicant does not plan to access private gardens or remove vegetation within someone's private garden.

Where temporary hedgerow loss is required to facilitate the Project, hedgerows will be reinstated to their original condition as detailed Section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]**.

In relation to the plots that refer to a section of public highway, the Applicant is seeking rights to apply a highways visibility splay to ensure the safe design of vehicular crossover bell mouths for the haul road. The extents of the RLB have been drawn to the Highways Ownership Boundary based on OS data. Where existing hedgerows or trees impact on the proposed visibility splay, these will be cut back or removed in order to provide a highways-

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4) Asked what provisions they will make to ensure our property is kept safe and secure if work goes ahead and if access is granted during the day or night. 5) It is not clear how overhead lines / telecom lines will be impacted and where they will occupy air space in and around the property or whether they are likely to be buried underground. 6) We rely on non-fibre wifi which is delivered via antenna on our property. Electricity pylons and overhead lines can interfere with this and we've asked for how this would be addressed. The applicant has said the plots 'may be affected' but cannot explain how, have not considered alternatives and have failed to outline how our property (and its occupants) would remain safe, secure and have privacy during any works and afterwards, where applicable. This strongly indicates the applicant has failed to provide an appropriate justification for seeking permanent rights and what would be done with them (Guidance, paras 5-9) when temporary access would be sufficient, and have insufficiently considered why permanent / temporary access is required at all, particularly in relation to the garden. In respect of the primary access, the permanent rights sought under Class 4 (a)-(d) would allow the applicant to control land close to the access to the property in	compliant access. It should be noted that there is a level of discrepancy between land registry plans, OS data and the highways ownership boundary, which may result in this landowner inadvertently becoming affected. However, the Applicant does not plan to access private gardens or remove vegetation within someone's private garden. In relation to the AP's concerns regarding potential interference with the aerial WiFi connection, some APs have questioned whether the Project may interfere with existing service connections, such as aerially-transmitted internet services. The Applicant notes these concerns, but confirms that the proposed overhead line is designed to the Applicant's technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report [REP3-034] and would present no issues for electrical equipment, telecommunication, WiFi, GPS and broadcast equipment under normal operating conditions. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

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perpetuity by the simple act of parking vehicles upon it. Together, the effect of the permanent and temporary rights sought, constitute a disproportionate and severe infringement of our rights under Articles 1 and 8 of the ECHR and would be detrimental to the habitable use, safety, amenity, privacy, value and saleability of the property.

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

In respect of the AP's human rights concerns, the Applicant refers to 4.1 Statement of Reasons and 8.1 The Protected Rights.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

224. AP 224 - BRICKKILN FARM SOLAR LIMITED

224.1 Person with Interest in Land (PIL) Reference ID: 10138

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
Brickkiln Farm Solar Limited ("Brickkiln") maintains the position expressed in its consultation responses of 25 July 2024 and 17 July 2025 and in its representations submitted on 27 November 2025 (Examination Library ref. REP1-211) and 26 February 2026 (Examination Library ref. REP1-212) (together, "the Representations" and each a "Representation") in respect of the application by National Grid Electricity Transmission ("NGET") for development consent for its Norwich to Tilbury project ("the Proposed Development"). There has been no material progress in negotiations with NGET since the submission of the latest Representation despite Brickkiln's efforts to engage: the information requested from NGET in the Representations has not been provided, no heads of terms for the voluntary acquisition of land rights have been received, and NGET has not confirmed that an indemnity will be provided for any damage caused to Brickkiln Solar Farm by the Proposed Development.	Summary of Objection Brickkiln Farm Solar Limited ("Brickkiln") maintains its objection in respect of its operational solar farm, as set out in its consultation responses of 25 July 2024 and 17 July 2025 and representations submitted to the Examination at REP1-211 and REP1-212. Brickkiln's land is identified for compulsory acquisition on Land Plan A Sheet 2, comprising plots A-2/31, A-2/35, A-2/36, A-2/37, A-2/38, A-2/39, A-2/40, A-2/41 and A-2/43, for the purposes of constructing overhead transmission infrastructure (Route RG) between Norwich Main Substation and Bramford Substation. Brickkiln contends that: the Applicant has not demonstrated a compelling case in the public interest for the compulsory acquisition of rights over the solar farm; reasonable alternatives and modifications to avoid the solar farm have not been considered; the Applicant has not engaged meaningfully or issued heads of terms; the potential financial losses from shading and displaced/removed solar panels have not been accurately quantified; and no indemnity has been offered for damage to the solar farm. Brickkiln invites the Inspector to require modifications to the scheme to avoid the solar farm and to refuse compulsory acquisition powers in relation to it. Land Rights Sought The Applicant understands that this AP holds a Leasehold and Easement Right or Privilege interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 3 (underground cable infrastructure); (c) Class 4 (overhead line and underground cable infrastructure); and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure); and (b) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Executive summary

NGET has not demonstrated a compelling case in the public interest for the compulsory acquisition of rights over Brickkiln Solar Farm. NGET has not made reasonable efforts to negotiate with Brickkiln, nor has it provided evidence to clarify the full extent of the impact that the Proposed Development would have on Brickkiln Solar Farm. It is reasonable to assume that the Proposed Development could cause Brickkiln to suffer significant financial losses and it is not clear whether NGET has allocated sufficient resources to fully compensate Brickkiln.

NGET has also not provided any evidence to suggest that reasonable alternatives and modifications to the scheme have been considered which would avoid the need for rights over Brickkiln Solar Farm.

In any event, it would be counterintuitive for improvements to low-carbon transmission infrastructure to come at the expense of an operational renewable electricity generating station.

Brickkiln therefore respectfully requests the Inspector to require modifications to the Proposed Development to avoid Brickkiln Solar Farm and refuse to grant compulsory acquisition powers in relation to Brickkiln Solar Farm.

Relevant legislation and guidance

also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response

The Applicant met with the APs representative on 19th June 2026 to continue discussions on the HOTs for the representatives' clients.

In terms of the wider routeing and siting considerations and the AP's request to avoid the solar farm altogether, the Applicant considered an alternative alignment to the west, closer to Mulbarton, which was ruled out because it would transfer effects to more residential properties, including the edge of Mulbarton, and would encircle multiple properties between the existing 4YM overhead line and the proposed overhead line. Likewise, moving the alignment to the east would increase impacts on an adjacent solar farm development.

Discussions between the Applicant and Brickkiln Solar Farm are ongoing. The Applicant has designed the overhead line route to avoid permanent loss of Brickkiln Solar Farm infrastructure wherever possible. The current design places pylon RG14 outside the solar farm boundary to reduce shading and operational impacts. The Applicant recognises Brickkiln Solar Farm's concerns in relation to potential shading implications of the Project on the stakeholder's solar development. The final pylon design, conductor type and position information is expected to be confirmed at detailed design and will be shared with Quintas Group once available. A SoCG is in place with Brickkiln Solar and The Applicant.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Section 122 of the Planning Act 2008 ("the 2008 Act") provides that a DCO may include provision authorising the compulsory acquisition of land only if the Secretary of State ("SoS") is satisfied that the land is (inter alia): (a) required for the development to which the DCO relates; or (b) required to facilitate or incidental to that development. There must also be a compelling case in the public interest for the land to be acquired compulsorily. The September 2013 'Planning Act 2008: Guidance related to procedures for compulsory acquisition' ("the Guidance") identifies a number of factors which the SoS will refer to in deciding whether to authorise the compulsory acquisition of land in the DCO. These include that: (i) the applicant should be able to demonstrate that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored and the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, necessary, and proportionate (paragraph 8 of the Guidance); (ii) the applicant must be able to demonstrate that there is a reasonable prospect of the requisite funds for acquisition becoming available (paragraph 9) (iii) the SoS must be persuaded that the purposes for which the DCO authorises	As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compulsory acquisition of land are legitimate and sufficient to justify interfering with the human rights of those with an interest in the land affected (paragraph 10);

(iv) the SoS must be satisfied that the land to be acquired is: (i) no more than is reasonably required for the purposes of the development where land is required for the development; or (ii) no more than reasonably necessary for the purpose for which it is acquired and is proportionate where the land is required to facilitate or is incidental to the development (paragraph 11);

(v) the SoS must be persuaded there is compelling evidence that the public benefits that would be derived from the compulsory acquisition will outweigh the private loss that would be suffered by those whose land is to be acquired (paragraph 13).

Paragraph 16 of the Guidance provides that the SoS could decide against including provisions authorising the compulsory acquisition of land in the DCO where the SoS is not persuaded all of the land is necessary or considers that the scheme should be modified.

Paragraph 25 of the Guidance provides that applicants should seek to acquire land by negotiation wherever practicable.

Objection to interference with land Brickkiln's land at Brickkiln Solar Farm ("the Land") is

includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

identified for compulsory acquisition on Land Plan A Sheet 2 (plots A-2/31, A-2/35, A-2/36, A-2/37, A-2/38, A-2/39, A-2/40, A-2/41, and A-2/43).

According to the draft Order for the Proposed Development (document reference 3.1), rights over the Land may be needed for the construction and installation of a new overhead transmission electric line (Route RG) between the two gantries at Norwich Main Substation (Work No. 1) and the two gantries at Bramford Substation (Work No. 3), including: (a) the foundations and steelwork to construct new pylons; (b) the installation of 69 kilometres of overhead transmission electric line between Norwich Main Substation and Bramford Substation; (c) the installation of conductors, insulators and fittings; and (d) the installation of fibre optic conductors. The DCO application contemplates rights being compulsorily acquired over the Land for overhead and underground cables and temporary use of the Land ("the Rights").

It does not appear that NGET has considered all reasonable alternatives which would avoid the need for the Rights to be compulsorily acquired. It may be possible to meet the need for low-carbon transmission infrastructure without compulsorily acquiring the Rights. Brickkiln has not been provided with any site-specific assessment to justify the need for the Rights over the Land. NGET has therefore not

the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

demonstrated that it is proposing to compulsorily acquire no more land than is reasonably required or necessary for the Proposed Development. Brickkiln acknowledges that pylon RG14 is now located outside the operational boundary for Brickkiln Solar Farm to mitigate earthing interactions and safety risks. However, it is not clear that NGET has considered undergrounding or any other modifications to the scheme to avoid the need for the Rights to be acquired. It is therefore not clear that the proposed interference with the Land is for a legitimate purpose and necessary for the Proposed Development. If there is a reasonable alternative to acquiring the Rights, it is neither legitimate nor necessary to authorise the use of compulsory acquisition powers which would disrupt Brickkiln's enjoyment of its land.

The interference to Brickkiln Solar Farm would also be disproportionate. The operation of Brickkiln Solar Farm, which is currently producing renewable energy and contributing to Clean Power 2030, should not be prejudiced by the compulsory acquisition of the Rights if reasonable alternatives should have been given further consideration. It is not proportionate to disrupt renewable electricity generation at an operational solar farm with a view to enabling the delivery of low-carbon transmission infrastructure if the Proposed

may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 — Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Development could be delivered without the Rights being compulsorily acquired.

In the absence of detailed design, method statements, and outage requirements, Brickkiln has been unable to carry out a shading analysis and other evaluations to accurately assess the level of loss it would suffer as a result of the compulsory acquisition of the Rights. Brickkiln has also been unable to confirm the operational, safety, and earthing risks posed by the Proposed Development. However, it appears likely that the overhead cabling would cause shading, and the construction and operation of the cables would require the displacement and/or removal of solar panels. This would disrupt the generation of electricity at Brickkiln Solar Farm, and it is not unreasonable to assume this would cause Brickkiln to suffer significant financial losses. Such losses carry weight and must be assessed against the public benefit of the Proposed Development, but the appropriate weight to be given to these losses cannot be identified until the losses themselves have been accurately quantified. As the level of loss has not been accurately quantified at this stage, this also casts doubt on whether NGET has allocated sufficient resources to fully compensate Brickkiln for its losses.

Brickkiln further objects to the grant of compulsory acquisition powers on the basis

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that NGET has not satisfactorily engaged in negotiations with Brickkiln to date. NGET has not yet provided information to allow Brickkiln to assess its commercial position in terms of the risks posed by the Proposed Development. This has prevented Brickkiln from being able to meaningfully negotiate with NGET. NGET has also not issued proposed heads of terms for acquisition by agreement. Brickkiln has therefore not been presented with an alternative proposal to consider instead of compulsory acquisition.

Brickkiln therefore respectfully invites the Inspector to require modifications to the Proposed Development to avoid Brickkiln Solar Farm and to refuse to grant compulsory acquisition powers in relation to Brickkiln Solar Farm.

Brickkiln reserves the right to maintain its objection to the Proposed Development throughout the Examination unless and until satisfactory information is provided or changes to the scheme are made. Brickkiln also reserves the right to submit further representations.

225. AP 225 - John Stacey

225.1 Person with Interest in Land (PIL) Reference ID: 5698

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Reasons for objecting. No alternative route At the onset, on receiving the first documents from NG we were only given a purple swathe where NG had pre-determined the pylon route. This was not at the formative stage so did not meet the first Gunning Principle Rule. Lack of engagement. We only had direct engagement with FG, NG avoided direct engagement. The statutory guidance to which NGET need to "have regard" is here: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK. The section "What is needed for consideration of land matters?" "the strong expectation is that applicants of proposed NSIPs will act reasonably in engaging with landowners", One example of a lack of engagement is the survey licences. According to the terms of these licences land owners are allowed to receive the raw survey data within 14 days. NG consistently refused our requests for these results. This would have led to less	Summary of Objection The AP raises a broad range of objections relating to his farm. These include: alleged failure to consider alternative routes, with the initial swathe described as a pre-determined route presented without adequate consultation at the formative stage; a lack of direct engagement by NGET, with Fisher German acting as intermediary and requests for raw survey data consistently refused; inadequate consideration of the impact on the AP's horses, notwithstanding multiple proposals by the AP to keep the horses in their existing paddocks and field; harm caused by the haul road, which runs diagonally across a 4-metre-deep ditch requiring removal of approximately 100 metres of hedge and disruption to seven field drains; UKPN works involving the re-routing of an existing 11kV overhead line through the farm yard, which was only discovered in July 2025; inadequate consideration of offline/HVDC undergrounding alternatives; farm safety clearance concerns regarding the overhead line height and agricultural machinery; payment rates described as too low; the excessive width of the draft order limits; and the positioning of a construction compound. The AP has met with Fisher German in February and with NGET and Fisher German on 12 May 2026, but the AP considers that inadequate answers were received to points raised at those meetings. Land Rights Sought The Applicant understands that this AP holds a Freehold, Occupation and Easement Right or Privilege interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 3 (underground cable infrastructure); (c) Class 4 (overhead line and underground cable infrastructure); and (d) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure); and (b) Class

Please summarise (in no more than 1500 words) the reason(s) for your objection

design issues going forward. The only opportunity to speak directly was at the Consultation events. We were always told at these events that our horses were a special case and NG were aware of the problem. We were led to believe that provision would be in place for our horses wellbeing. We were also promised electric gates for our crossing points. At present these seem hollow promises. We made representation at every consultation event, any suggested route of design change was difficult to find as it was lost in the general documents available on line.

At every opportunity we proposed options to allow our horses to remain in their existing paddock and field. We also highlighted the excess harm the haul road planned routeing would have in the need to remove around 100m of hedge and deep ditch. This could be minimised by a small western change to the route.

NG avoided any direct engagement and therefore localised design accommodation was avoided.

Both of my neighbours have indicated that they have proposed slight movement of pylons TB94 and TB100 to the West. If there had been a coordinated approach we could all have had our requests accommodated.

Route Design

Applicant's Response

4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Engagement

The Applicant does not agree with the notion that they have not engaged with the landowner. In addition to providing hours of discussion with multi-disciplinary teams at many of the Statutory Consultation events in 2024 The Applicant has held multiple meetings with the landowner, including on site, and has offered micro-siting of pylons, mitigation measures for the two horses and provided further clarification on a number of points. The Applicant provided feedback on a number of points in an email dated 23 June 2026 to the landowner's agent and is currently awaiting feedback and costings to progress discussions. The Applicant also met with the landowner's agent (Whirledge & Nott) on 15 July 2026 to discuss the concerns regarding the horse paddock at length as well as detailed points within the Heads of Terms. The Applicant will continue to liaise with the landowner and their agent to progress discussions and seek voluntary agreement.

The Applicant also notes that the landowner has requested more detailed maps of design specifications over the landholding, which is an action the Applicant will take away. In addition, the Applicant will seek to provide regular information regarding project programme which can be communicated in advance of and during the construction to provide a more detailed understanding of the time when any construction works will take place. The Applicant will seek to provide such details to ensure efficient cropping of the land up until the commencement of construction.

Micro-siting of Pylons

TB98 was relocated westwards from its 2023 position to remove it from location within a horse paddock, with further movement constrained by span length requirements.

Provision of Survey Data

The Applicant's records show an EIR request was received on 22nd July 2025, NGET responded on 19th August 2025. The survey data was not disclosed under EIR as it was incomplete at the time. Requests were not refused, the survey data was not available. The data was provided to the AP on 25th September 2025.

Alternative Route / Adequacy of Consultation

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The route should have been designed to minimise the harm. Soils NG still make the claim that the routeing and siting selection process confirms that there are no other suitable soils sites of poorer agricultural quality that can accommodate the project. They highlight that they looked at the impact on agricultural land and sought to minimise impacts on the BMV land. This cannot be true as, according to NG, soils were scoped out in the design and routeing process. Proximity to our house. The route could have been designed to allow a greater distance from our house. Crossing Horse paddock During the design process there was a lack of consideration the construction would have on horses. When pylon TB98 did get moved 80m its construction area footprint was still within the paddock and the construction noise still in a position that the horses would not tolerate, this is also the case with the haul road which runs alongside the paddock. This re positioning of TB98 has in fact been counterproductive as its resighting has still meant the horses will need moving and the pylon is now not near the field edge.	Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have asserted that the Applicant's approach to pre-application consultation was inadequate. The Applicant respectfully disagrees with those assertions. In particular, it is noted that the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for the Project into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to the Applicant's approach to consultation can be found in 5.1 Consultation Report [APP-066] and detail on the application of the Gunning Principles can be found in 5.1 Consultation Report — Appendix N: Legal Opinions [REP1-007]. Offshore / HVDC Undergrounding / Alternatives A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required. The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Harm from the haul road.

The haul road that runs to the west of TB97 has been designed to run diagonally across our 4m deep ditch.

This has meant that around 100m of hedge will also be removed. The ditch has seven field drains running into it, these will need to be kept open and running and the ditch will need to be reinstated.

UKPN works

In July 2025 we found out that NG had changed the plans and decided to re-route the existing 11KV OHL through our farm yard. This will cause immense disruption. We have since offered to allow the undergrounding to be rerouted through a grass area around the house which would be considerably cheaper and avoid the considerable disruption the planned route would create. Unfortunately, this is outside the DCO draft order limit so is not possible. If there had been any engagement from NG and UKPN before May 2026, when we first found out the reason for it going through the farm yard, this could have been resolved before the DCO. Some 5 weeks later we are still awaiting further contact from either party. This is not the only issue we have with the OHL rerouting. Over by TB96 there is to be over 300m of undergrounding for the OHL, this OHL that is being removed is not even on our land.

Applicant's Response

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Permanent Access

The landowner's agent is aware that alternative permanent access routes can be agreed between the Applicant and the landowner by way of a voluntary agreement.

Crossing Horse Paddock

The Applicant does not agree with the comment that there has been a lack of consideration that construction would have an impact on the AP's horses. The Applicant has met with the landowner on various occasions, including most recently on 12 May 2026, where the Applicant offered the prospect of livery services offsite for the landowner's horses. The Applicant provided further comments in an email dated 23 June 2026 and is awaiting a response from the landowner's agent before precise mitigation measures can be agreed. In relation to the position of pylon TB98, as noted in 8.4.12 Applicant's Comments on Post Hearing Submissions, TB98 was previously moved approximately 80 metres to try to position the pylon outside of the horse paddocks so it was an oversail only; there is limited scope to move the pylon further at this location.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Lack of updated maps Looking at the design, firstly it has been and still is difficult to establish what is proposed, the amendments in 2025 were not available on NG's interactive map until the DCO was made. Suds The suds are not all positioned to allow natural drainage from the haul roads. Construction Compound. The plan is that there will be a construction compound on our land alongside the B1018, the bellmouth into the compound will be problematic as the field is around a metre higher than the road and the compound has been placed where the road has a gradual curve. I have been told that NG will not lower the field level, but as a landowner we need to see a design as eventually we will need to bring the area back into crop production. Permanent Access These tend to run within the fields and do not make use of the headlands. This access needs to be agreed mutually and not just imposed upon us from the NG desktop design. Draft Order Limit The width of the draft order is excessive. We are uncertain what is planned within this area. Will we be able to farm the land up to the start of construction and what will the	Haul Road / Hedgerow Loss Temporary loss of hedgerows will be required to facilitate the construction of the Project. Micro-siting at the detailed design stage will seek to minimise impacts to hedgerows wherever practicable as detailed within 7.4 Outline Landscape and Ecological Management Plan [Revision G] and secured through commitment B13 of 7.2 Outline Code of Construction Practice [Revision G]. Where temporary hedgerow loss is required to facilitate the Project, hedgerows will be reinstated to their original condition as detailed Section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision G]. Soils During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). All land temporarily required would be reinstated in line with 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D], including land required for haul roads. The Outline Soil Resource Plan also details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), or the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. Farming Operations Temporary disruption to farming operations during construction (including disruption from haul roads) would be reduced through good practice, such as: maintaining/ providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [Revision G]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example in relation to temporary land take, reduced yields due to irrigation disruption, etc.).

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
area of land that will not be available to be cropped be and how long for? Inadequate Consideration of Alternatives. Several alternatives have not been properly considered. TS Conductors These would mean potential for a reduced number of pylons. Offshore. After a lot of pressure NG made a token attempt at looking at an offshore option. They did not look at an offshore hub but just a direct route, this was for three 2MW DC Cables. In fact, as it was DC, two cables would have been sufficient as found in the Eastern Green Link 3 & 4 Strategic Optioneering Report 2024 HVDC Undergrounding. This could be considerably less harmful and would only need 4MW as DC is more efficient. Project costs. The 10% contingency is considerably low and would cover the injurious compensation which seems impossible to have benchmarked when the level of design is at such a preliminary stage. Farm safety. Clearance of farm machinery According to NG, line safety clearance for farm machinery is expected to be	The Applicant recognises concerns that electricity infrastructure and associated rights may result in long-term restrictions on land use and agricultural productivity. In developing the Project, the Applicant has sought to minimise such effects by limiting permanent land acquisition and instead relying, wherever practicable, on the acquisition of defined rights rather than full ownership of land. The rights sought are confined to those necessary for the safe construction, operation and maintenance of the assets and are designed to enable the continued agricultural use of land beneath and around the infrastructure. The majority of affected agricultural land will remain in productive use following construction, subject only to proportionate restrictions that are typical for high-voltage transmission infrastructure, such as adhering to safety clearances. 7.2 Outline Code of Construction Practice [Revision G] includes biosecurity measures (AS07, B04); a commitment is given that these would cover agricultural weed and nuisance species (which are not covered under the invasive non-native species classification or relate to a specific disease outbreak). Payment Rates These payments are in line with National Grid's Land Rights Strategy and Payments Schedule for Assets, which has been developed to provide a consistent, transparent and proportionate framework for voluntary acquisition of land rights and is reviewed on a regular basis. National Grid is confident that the payments set out in its Land Rights Strategy and Payments Schedule for Assets are extremely competitive in comparison to the likely compensation that may be awarded on a statutory land compensation basis. The tower payments are based on a capitalised sum (recognising the in-perpetuity nature of the agreement) and use similar principles to the annual wayleave payment rates which take into account elements such as yield and input losses, time loss and disturbances caused to the farming operation of the land. The payments in respect of permanent rights for towers and overhead lines provide consistency in payments made to obtain land rights, and ensures all landowners are treated fairly and equally, and in accordance with the expectations of existing legislation. Construction Compound The Applicant will provide further feedback at the point at which detailed design has progressed. In the meantime, please refer to the Code of Construction Practice. The

Please summarise (in no more than 1500 words) the reason(s) for your objection

implemented by third parties whenever they are near overhead lines. NG state that agricultural vehicles, such as combine harvesters will be safe to pass underneath. Across our farm the indicated line will be below 10m at its lowest point. According to the Energy Network

Association Passing safety clearance is for harvesting is 4.3m for 400 Kv, at present the largest New Holland Combine at its highest point is 6.56m. This will create unacceptable safety concerns for farmers.

Payment rates

NG are using their Land Rights Strategy for payments for pylons, these payments are too low and NG are relying on injurious compensation. EirGrid are offering an upfront payment of €43,000 for pylons and €140 per metre for power lines. In addition, there is a minimum payment of €8,000, and landowners may seek further compensation within six years.

Current negotiations

We met FG in February and discussed UKPN Undergrounding, Siting of Pylons/Haul roads, Horse Paddocks, Construction Impacts, Footpath Diversions, Trees, Haul Roads and Badger Setts. We then had a meeting with NG and FG on 12TH May. We had expected at this meeting to receive answers to the points we raised at the February meeting but NG couldn't tell us

Applicant's Response

Applicant will raise this point internally and seek to obtain early designs of the proposed bellmouth that can be shared with the landowner and their agent.

Suds

The Applicant will discuss the natural drainage with the landowner agent's.

UKPN Response

The affected party has requested that UK Power Networks consider an alternative route for the proposed 11kV underground cable, however, this route (as noted by the affected party in the Regulation 17 response) falls outside of the DCO red line boundary and therefore cannot be accommodated at this stage. A meeting was held between the landowner, UK Power Network's agent and the project manager on 11th May 2026. Additionally, all plans for the proposed works were provided to the landowner's agent at the beginning of May. As per UK Power Network's position statement regarding the compulsory acquisition of land rights, UKPN will continue to engage with the landowner to agree the rights required voluntarily (beyond the completion of examination and/or the granting of the DCO as required) until such time that compulsory acquisition is the only resolution.

Farm, Clearance of farm machinery

The Applicant's design for the Project is governed by its relevant statutory duties and obligations as set out in paragraph 5.3.50 of 7.15 Design and Access Statement (DAS) [Revision C].

Overhead conductors would have a minimum conductor design clearance to ground of 8.3 m as per the statutory clearance guidance (although in many cases this would be higher because of landform variations and because the minimum is typically towards the middle of the span and is higher closer to the pylons either side). This complies with the statutory clearances set in The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR 2002) and by the ENA Technical Specification 43-8 and allows agricultural vehicles such as combine harvesters to pass underneath.

Illustrative elevation profiles of the overhead line are available in 2.7 Elevation Drawings - Overhead Line Profiles – Parts 1 and 2 [APP-044 and APP-045]. The maximum vertical limits of deviation (LoD) are secured by Article 5 of 3.1 Draft Development Consent Order [Revision F].

Please summarise (in no more than 1500 words) the reason(s) for your objection

anything. Do NG have plans or are they just not willing to share them with us? We are uncertain on their plans for our horses, as if the plan goes ahead they will need permanently relocating well ahead of any works, which will be a considerable cost that we cannot afford and cannot be burdened with.

Conclusion

We are not going accept a voluntary agreement as NG, over the four years, have not sufficiently engaged with us and have withheld information. They have not taken on board our suggestions even though we indicated that we would not voluntarily agree if they did not resolve the issue with the horses and move the pylon away from their paddock. The design at its infancy should have considered a higher degree of embedded mitigation for noise even it had been further from our residence.

Applicant's Response

Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines. Third parties may refer to the following guidance:

- Health and Safety Executive (HSE) specific agriculture information sheet number 8, 'Working safely near overhead electricity power lines'
- HSE general guidance HSE GS6, 'Avoidance of danger from overhead power lines'
- ENA Safety information for safe usage of mechanical plant in the vicinity of overhead power lines, 'Look out, look up!'
- National Grid's Third-party guidance for working near National Grid Electricity Transmission (NGET) equipment, TGN 287
- Statutory clearances guidance in ENA's TS 43-08 Overhead line clearances specifies minimum vertical clearances for vehicles/machines passing below, including, but not limited to, guidance that irrigators, slurry guns and high-pressure hoses, or similar, should be 30 m from electrical conductors.
- Third-party guidance for working near National Grid Electricity Transmission (NGET) equipment, TGN 287, discusses responsibilities and risk near electrified overhead lines, particularly in Part 2, pages 04 and 05. Land use and access is discussed in Part 3 on page 07.

The Applicant's position is that there is no indication that the respondent actually uses or intends to use a combine of the size indicated 'the largest new holland combine'. As such this creates a misleading, hypothetical and disingenuous basis for design. In practice large farm machinery operates safely under overhead lines throughout the UK without impediment. Clearances vary depending on landform and proximity to the pylon being greater the closer to the pylon, and in the case of combines as to whether the unloading auger (usually the highest point) is deployed. The Applicant remains of the view that the response provided, and accompanying documentation establishes a basis for safe working that is appropriate for the circumstances encountered along the route.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

226. AP 226 - Richard Long Group Limited

226.1 Person with Interest in Land (PIL) Reference ID: 10184

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The objections to the interference with land rights are summarized as follows • The Applicant's failure to consider alternatives for their project, less intrusive options exist • The land is not necessary for the scheme, alternative designs or routes could avoid acquisition of these rights. • The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods, in this case involving a solar farm • Pre-application-there has been insufficient detailed preparatory work by the Applicant prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward • Inadequate engagement or negotiation-we have been trying to address with the	Summary of Objection Richard Long Group Limited objects to the interference with its land rights on the following grounds: (1) failure to consider less intrusive alternatives; (2) the land is not necessary for the scheme, as alternative designs or routes could avoid acquisition; (3) the private loss and human rights impact, including significant harm to a solar farm business and livelihood, outweighs the public benefit; (4) insufficient detailed preparatory work was carried out by the Applicant prior to the DCO application; (5) inadequate engagement or negotiation over nearly three years; (6) absence of a sufficiently strong compelling case in the public interest; (7) concerns about fair and timely compensation; and (8) despite negotiations, no heads of terms for a voluntary agreement have been concluded. Land Rights Sought The Applicant understands that this AP holds a Freehold and Occupation interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response The Applicant confirms that negotiations for this landholding are being handled by Fisher German. A site meeting was held with the landowner and their agent on 4th June 2026 to discuss accommodation works such as crossing points and pylon siting. Accommodation matters have been recorded on the LIRA and are being reviewed. The AP's agent attended the Norfolk agent meetings, at which both Fisher German and National Grid were in attendance, on 19 June 2026. Extensive ongoing engagement has continued and it is

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Applicant the issue of the proposed power lines crossing the solar site for nearly 3 years with little feedback from the Applicant • Lack of compelling case in the public interest-the Applicant has not demonstrated a sufficiently strong justification for the project • Compensation issues-we have concerns about whether affected parties will receive fair and timely compensation • Heads of Terms-despite negotiations with the Applicant no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement from the Applicant	understood that a signed SOCG has been received on 20 July 2027 following the extensive ongoing conversations between the AP and The Applicant. In relation to the AP's concerns regarding the interaction between the Proposed Development and the solar farm, the Applicant has considered the potential effects of oversailing the solar PV development and has discussed these matters with the landowner and its representatives. The Applicant's position, as explained during CAH2, is that the presence of the proposed overhead line does not preclude the continued operation of the solar farm and that the Project has been designed to minimise impacts where reasonably practicable. The Applicant has engaged with the AP regarding accommodation measures, including the siting of pylons and crossing arrangements, and remains willing to consider further reasonable mitigation proposals. The Applicant's assessment is that the rights sought are limited to those reasonably required for the Project and that the continued operation of the solar farm can be accommodated alongside the Proposed Development. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 — Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

227. AP 227 - Linda Fisher

227.1 Person with Interest in Land (PIL) Reference ID: 1169

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
am writing to you because my land is directly affected by the proposed Norwich to Tilbury Grid Upgrade Scheme, with our comments for the statutory consultation in relation to Norwich to Tilbury Grid Upgrade. Property description: My property comprises a detached cottage with gardens and additional, connected, land containing a reservoir. The property is located on Fossetts Lane in the village of Fordham in Essex. The land and reservoir, serve a very important role in my family life, providing a safe recreation and amenity area for family and friends. My property is not a commercial horticultural or agricultural property, and therefore differs from the majority of properties directly affected by the scheme, which are predominantly, traditional agricultural use. A Nationally Significant Infrastructure Project (NSIP) has significant impact on all types of property that are directly affected by it, but	Summary of Objection Linda Fisher's objection relates to her detached cottage with gardens and reservoir at Fordham, Fossetts Lane, Essex. The AP raises concerns regarding: the adequacy of engagement over approximately two years, during which no significant site-specific information has been provided; the lack of clarity over land plan boundaries, in particular as to whether the AP's reservoir is included in the land sought; the Applicant's failure to provide a sufficiently compelling case for the necessity of acquiring her land rights; and the impact of the Project on her health and wellbeing, including stress and anxiety arising from uncertainty about the effect on her home and the surrounding environment. Land Rights Sought The Applicant understands that this AP holds a Leasehold, Occupation and Easement Right or Privilege interest within the Project Order Limits. The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 4 (overhead line and underground cable infrastructure); and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs

Please summarise (in no more than 1500 words) the reason(s) for your objection

often greater impact is felt on residential properties, such as mine.

In most cases, residential occupiers are unfamiliar with any form of compulsory purchase and the direct impact this can have. As a result, it is even more important that detailed information is provided to them to enable them to understand the impacts, and to attempt to allay natural fears and heightened anxiety.

Land Plans

The land plans showing the scheme requirements provided to me in Fisher Germans letter date 16th June 2025 are, for a lay-person unfamiliar with such infrastructure schemes, very difficult to interpret. Two plans were provided with the letter. One shows the scheme requirements related to one HM Land Registry Title Number at small scale and the other at a larger scale. From the Legend accompanying the plans it is not possible to ascertain with any certainty what the areas are required for. The plans show a portion of the southeast bank of the reservoir shaded green. The Legend states that this is "Zone for permanent assets (NGET)". No further detail is provided.

In an attempt to gain clarity, the Norwich to Tilbury interactive map accessed at <https://norwichtotilburymap.nationalgrid.com/> was referred to. This shows similar to the

Applicant's Response

representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

In relation to the AP's concerns regarding the impact of the Project on health and wellbeing, an assessment was undertaken as part of the Environmental Impact Assessment for the Project in accordance with the scope set out in 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**. The Health and Wellbeing assessment is provided in 6.10 Environmental Statement Chapter 10 — Health and Wellbeing **[Revision C]** and assesses the potential effects of the construction and operation of the Project on the health and wellbeing of nearby residents and communities. The assessment covers both physical and mental health and wellbeing. In relation to impacts on mental wellbeing during construction, the assessment acknowledges that findings from consultation have highlighted the stress and anxiety experienced by people as a result of potential impacts of the Project on their local area, including in relation to uncertainty at this stage of the Project programme. The assessment highlights the role of community engagement and liaison to help overcome these concerns and the overarching approach to this is set out in 7.2 Outline Code of Construction Practice **[Revision G]**. In addition, the Applicant has committed to preparation of a detailed Communications Strategy (Commitment GG36 of 7.2 Outline Code of Construction Practice **[Revision G]**) in order to ensure that affected communities are kept fully informed regarding the progression of the Project in advance and during its construction. All relevant mitigation measures are secured through the commitments set out in 7.2 Outline Code of Construction Practice **[Revision G]**, 7.3 Outline Construction Traffic Management **Plan [Revision F]** and the DCO itself.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating

Please summarise (in no more than 1500 words) the reason(s) for your objection

plans issued, and with no further detail regarding the works.

As may be anticipated, the thought that part of my land is to be acquired by National Grid for any purpose is incredibly unnerving and has created a massive amount of stress and anxiety. The additional stress from the lack of information on the proposed use of the land has only served to make matters even worse.

Landowner Engagement

Over the past two years I, together with my land agents have engaged with your land agents Fisher German, and at every consultation stage useful feedback has been provided on National Grids proposed scheme. Additional detailed information and clarity has been requested from Fisher German / National Grid regarding the potential impacts of the scheme on my property. At each meeting, the said requested additional information has not been available for Fisher German to share with us and as a result, despite the two years of engagement, i still have very little significant specific information on how the scheme will actually affect my property.

Although engagement meetings have been provided to me, as stated, the distinct lack of significant content and details provided at those meetings has not only NOT helped

Applicant's Response

both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection

allay my fears, but has actually increased my concerns.

I am retired and enjoy the amenity that the reservoir provides to my property and the recreational opportunities it provides to my wider family.

Despite having entered into early engagement meetings, the position that I find myself in now with regards the scheme, through no fault of my own, is taking a considerable toll on my life and my wider family's life. The complete lack of significant information being provided from National Grid, has put me in an intolerable position.

Applicant's Response

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice **[Revision G]**, 7.3 Outline Construction Traffic Management Plan **[Revision F]**, 7.4 Outline Landscape and Ecological Management Plan **[Revision G]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation **[Revision C]** and Outline Public Rights of Way Management Plan **[Revision D]**. Residual effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

228. AP 228 - Chris Smith

228.1 Person with Interest in Land (PIL) Reference ID: 14516

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The interference with our land in Little Bromley is only being considered because of the plan to build a substation or connecting point at Ardleigh. I do not believe that a proper, evidence based case has been made for the alleged need to construct a sub station at Ardleigh. It is not needed for the Norwich to Tilbury project itself, and there are better ways to connect Five Estuaries and North Falls to the grid. The requirements of section 122 (2) are not therefore satisfied because the interference with our rights is not required for the Norwich to Tilbury project and is not incidental to it. In particular the Norwich to Tilbury project could and should be completed without coming anywhere near Ardleigh or Little Bromley.	Summary of Objection Chris Smith's objection relates to land in Little Bromley. The AP's primary concern is that the East Anglian Connection Node ("EACN") substation at Ardleigh has not been justified as being necessary for the Norwich to Tilbury Project itself and that its location should not be determined as part of this DCO process without further and proper consideration of alternative sites. The AP contends that the EACN location was effectively predetermined and that the Project cannot demonstrate a compelling case in the public interest for the compulsory acquisition of land given the absence of satisfactory justification for the EACN's location at Ardleigh. The AP further asserts that the Applicant has not adequately consulted on the siting of the EACN substation and that insufficient alternatives were considered. Land Rights Sought The Applicant understands that this AP holds an Occupation interest within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 — Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 4 (overhead line and underground cable infrastructure); and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response A telephone call was held on the 5 June 2026 with Fisher German to run through the TCPA. Ongoing engagement regarding all matters is continuing, including negotiation on HOTs

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

matters. At the initial siting stage we obtained information on permanent land requirements from the contracted customers and factored this into the process to ensure that there was potentially enough space for multiple substations. The securing of consent for the two other substations for North Falls and Five Estuaries rests with their respective developers and similarly it rests with Tarchon to site and secure consent for its convertor station. The Project responds to a two part need case to reinforce boundary transfers with a Norwich to Bramford to Tilbury double circuit connection and to connect the Essex Coast Generation Group. An integrated solution is one of many factors in reaching a preliminary preferred 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] providing the connection with less infrastructure than separate projects. This required the identification of an EACN location which is summarised in overview with further detail in the Design Development Report (APP-122) and the ES alternatives chapter (APP-130). The general location of a connection point reflects the location of the generation sources and the Transmission System. The independent NESO (then ESO) identifies the general location and issues Connection Offers which, once signed by the customer, are responded to by the Applicant who completes detailed siting (either on the existing Transmission System or at a new location linked by new 400kV connections) and routeing (of the 400kV connection if required) to identify an optimum solution. EACN (general siting) is set out in page 22–23 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and provides the reasoning for the selection of the Tendring Peninsula for the connection in view of, at the time, the North Falls and Five Estuaries wind farm connection agreements, due to the location of these generators and the customer connection works indicating the general location for connection. The conclusions from page 23 were 'Overall the appraisal concluded that options associated with Clacton landing points and EAC nodes in Tendring District are preferred. These locations, in combination with the required onshore connections from the node to the NTS, are more compliant with Holford and Horlock routeing and siting guidance, in particular by offering greater potential to avoid and minimise effects on AONBs than would be the case with Felixstowe landing points.' Potential sites were identified throughout the Tendring Peninsula with Zone A (combining a number of adjacent blocks for potential development) emerging as being preferred following a selection process. This is then subject to ongoing back-check and review. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. In making decisions the Applicant notes that: • Siting and routeing should consider the effects and costs

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

of 400kV connection infrastructure as well as how that influences the customer connection infrastructure and make a balanced decision. • Connections closer to the coast require two points of connection to the Transmission System. • The absence of nationally designated landscapes means the strong starting presumption for overhead lines (NPS EN-5) for connections on the Tendring Peninsula is not reversed. As a result, any site, beyond where they may impact the setting of a Nationally Designated landscape, is expected to require parallel 400kV overhead line connections. The preliminary location for the EACN Substation (Zone A) was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study **[APP-356]** in Section 6 as part of an iterative process. That document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports **[APP-122, APP-358, APP-359 and APP-360]**. The selected location east of Ardleigh balances the effects arising from 400 kV connection corridors and substation for the Applicant and the needs of those with signed connection agreements who will connect at the EACN. It took into consideration the installation of one of the Applicant's connections by underground cable to Zone A but the likely need for an onward double overhead line down the Tendring Peninsula to progress sites closer to the coast. Given the potential for colocation of customer infrastructure, sites were not progressed if they were individually too small and were subsequently clustered into zones. Zone A had the scale to potentially accommodate both the Applicant's and some of the other customer infrastructure.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 — Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

229. AP 229 - Natalie Smith

229.1 Person with Interest in Land (PIL) Reference ID: 14087

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The interference with our land in Little Bromley is only being considered because of the plan to build a substation or connecting point at Ardleigh. I do not believe that a proper, evidence based case has been made for the alleged need to construct a sub station at Ardleigh. It is not needed for the Norwich to Tilbury project itself, and there are better ways to connect Five Estuaries and North Falls to the grid. The requirements of section 122 (2) are not therefore satisfied because the interference with our rights is not required for the Norwich to Tilbury project and is not incidental to it. In particular the Norwich to Tilbury project could and should be completed without coming anywhere near Ardleigh or Little Bromley.	Summary of Objection Natalie Smith's objection concerns the same land in Little Bromley as AP 228 and is made in materially identical terms. The AP's objection is directed at the Applicant's failure to demonstrate that the East Anglian Connection Node ("EACN") substation at Ardleigh is necessary and justified for the Norwich to Tilbury Project, the absence of adequate consideration of alternative sites for the EACN, and the pre-determination of its location without proper consultation. The AP contends that, as a result, a compelling case in the public interest for compulsory acquisition of her land rights has not been established. Land Rights Sought The Applicant understands that this AP holds an Occupation, Freehold and Easement Right or Privilege interest within the Project Order Limits. The Applicant is seeking to permanently acquire land in which this AP holds an interest (Class 1 — Compulsory Acquisition of Land). The Applicant is also seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure); (b) Class 4 (overhead line and underground cable infrastructure); and (c) Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Consolidated Response A telephone call was held on the 5 June 2026 with Fisher German to run through the TCPA. Ongoing engagement regarding all matters is continuing, including negotiation on HOTs matters. At the initial siting stage we obtained information on permanent land requirements from the contracted customers and factored this into the process to ensure that there was

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Applicant's Response

potentially enough space for multiple substations. The securing of consent for the two other substations for North Falls and Five Estuaries rests with their respective developers and similarly it rests with Tarchon to site and secure consent for its convertor station. The Project responds to a two part need case to reinforce boundary transfers with a Norwich to Bramford to Tilbury double circuit connection and to connect the Essex Coast Generation Group. An integrated solution is one of many factors in reaching a preliminary preferred 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] providing the connection with less infrastructure than separate projects. This required the identification of an EACN location which is summarised in overview with further detail in the Design Development Report (APP-122) and the ES alternatives chapter (APP-130). The general location of a connection point reflects the location of the generation sources and the Transmission System. The independent NESO (then ESO) identifies the general location and issues Connection Offers which, once signed by the customer, are responded to by the Applicant who completes detailed siting (either on the existing Transmission System or at a new location linked by new 400kV connections) and routeing (of the 400kV connection if required) to identify an optimum solution. EACN (general siting) is set out in page 22–23 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and provides the reasoning for the selection of the Tendring Peninsula for the connection in view of, at the time, the North Falls and Five Estuaries wind farm connection agreements, due to the location of these generators and the customer connection works indicating the general location for connection. The conclusions from page 23 were 'Overall the appraisal concluded that options associated with Clacton landing points and EAC nodes in Tendring District are preferred. These locations, in combination with the required onshore connections from the node to the NTS, are more compliant with Holford and Horlock routeing and siting guidance, in particular by offering greater potential to avoid and minimise effects on AONBs than would be the case with Felixstowe landing points.' Potential sites were identified throughout the Tendring Peninsula with Zone A (combining a number of adjacent blocks for potential development) emerging as being preferred following a selection process. This is then subject to ongoing back-check and review. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. In making decisions the Applicant notes that:

- Siting and routeing should consider the effects and costs of 400kV connection infrastructure as well as how that influences the customer connection infrastructure and make a balanced decision.
- Connections closer to the coast require two

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

points of connection to the Transmission System. • The absence of nationally designated landscapes means the strong starting presumption for overhead lines (NPS EN-5) for connections on the Tendring Peninsula is not reversed. As a result, any site, beyond where they may impact the setting of a Nationally Designated landscape, is expected to require parallel 400kV overhead line connections. The preliminary location for the EACN Substation (Zone A) was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study **[APP-356]** in Section 6 as part of an iterative process. That document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports **[APP-122, APP-358, APP-359 and APP-360]**. The selected location east of Ardeigh balances the effects arising from 400 kV connection corridors and substation for the Applicant and the needs of those with signed connection agreements who will connect at the EACN. It took into consideration the installation of one of the Applicant's connections by underground cable to Zone A but the likely need for an onward double overhead line down the Tendring Peninsula to progress sites closer to the coast. Given the potential for colocation of customer infrastructure, sites were not progressed if they were individually too small and were subsequently clustered into zones. Zone A had the scale to potentially accommodate both the Applicant's and some of the other customer infrastructure.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case. In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 — Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report [APP-066] and Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

230. AP 230 - John Fisher

230.1 Person with Interest in Land (PIL) Reference ID: 6961

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We have been to the various public exhibitions to view the plans but pylons were the only option on the table, no consideration given to the alternatives, eg underground or offshore. Surely all options should have been available so the public could have a balanced view. NG have not taken into account the consequences of their actions will alter the character and visually pollute a wide corridor of East Anglian countryside either side of the route. The cables will be a major hazard to migrating birds, the footings will eat up many acres of productive farmland. We are privileged to live in a cottage in FORDHAM that has enjoyed unblemished views over the beautiful Colne Valley for over 500 years. The woodland trust recently planted 1000's of trees around the village and visitors come from all around the country to enjoy them but if the preferred route goes ahead not only will our cottage will be SURROUNDED by pylons, the trees	Summary of Objection John Fisher's objection concerns his property at Fordham, in the Colne Valley. The AP raises the following concerns: the Applicant has failed to consider reasonable alternatives such as underground cabling or an offshore route, which would avoid the need for overhead pylons and the visual pollution they create; the pylons constitute a hazard to birds; the proposed route will have a significant adverse impact on the landscape, including mature trees, in particular the area of Fiddler's Wood; there has been no adequate consideration of the archaeological record between pylons TB46 and TB52; and the AP believes that the Applicant could route the line to avoid his property if an offshore solution were adopted. The AP is concerned that the impact on the visual amenity, ecological interest and archaeological significance of the land has not been adequately assessed or mitigated. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 4 (overhead line and underground cable infrastructure), (c) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought). Consolidated Response The AP's representative attended an Agent's Group Meeting with Fisher German and National Grid on both 20 April 2026 & 4 June 2026. Continued engagement with the APs

Please summarise (in no more than 1500 words) the reason(s) for your objection

will be a casualty, who would like to picnic under a pylon! Thankfully there is a lot of opposition against these plans, with the alternatives of underground and the preferred option of offshore pipelines suggested.

National Grid should consider undergrounding between TB42 and TB50 in light of the special character of the Fordham Valley and the disproportionate impact pylons there would bring.

6) There is significant archaeology in the area between TB46 and TB52. Damage to these sites is unacceptable and careful routing will be required to avoid entirely, regardless

of whether pylons or underground cable are employed. The woodlands at Fiddlers Farm / Fiddlers Woods are ancient and Fiddlers Farm is a Listed Building, ruling out a more easterly route.

Thank you for considering my comments.

Applicant's Response

representative is underway regarding HOTs negotiations, with the latest meeting held with The Applicant, the Applicant's representative and the AP applicant on 15 July 2026.

In relation to Fiddler's Wood, the Applicant can confirm potential impacts to Fiddlers Wood have been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. No loss of woodland is expected at Fiddler's Wood. This Local Wildlife Site and ancient woodland site would be located near a visibility splay along Fiddlers Hill from bellmouth TB-B045. Management of the vegetation along the road would be required to maintain the visibility splay in proximity to the woodland, but no de-vegetation of woodland is proposed. No breaking ground works would be required. No direct loss of woodland is expected. Mitigation measures for Fiddler's Wood are included within **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D]**. Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significant residual effect on the LWS and ancient woodland.

In relation to effects on the landscape of the Colne Valley, these are set out under the Colne River Valley Floor Landscape Character Area (LCA) and Colne River Valley Slopes LCA in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B]**. The assessment notes that there would be a significant adverse effect on the landscape character of the valleys in this area within approximately 1.5 km of the Project.

Effects on visual receptors within the Fordham Valley are set out under Visual Receptor Areas (VRAs) D5 Fordham (including Fordham Hall Estate, the Woodland Trust site), VRA D6 West Bergholt, Fordham Heath and Eight Ash Green and VRA D7 Fordstreet and Aldham in paragraphs 13.7.52 to 13.7.87 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [Revision B]**. There would be significant adverse visual effects within approximately 1.5 km of the Project including within the River Colne tributary valley which lies between Fordham and West Bergholt.

In relation to the AP's concerns regarding archaeology between pylons TB46 and TB52, the Applicant is aware of the archaeological potential between TB46 and TB 52. In response to the identification of asset (6062), pylon TB149 was moved southwards and located against the field boundary. The identification of assets (4081) and (4082) has resulted in pylon TB47 being moved to the north and into the adjacent field. The LoD for TB47 has been restricted in

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

commitment GG34 to prevent southerly movement towards the archaeological site (7.2 Outline Code of Construction Practice **[Revision G]**). Likewise, the temporary haul road between pylons TB47 and TB48 was moved south-eastwards to further reduce the chance of impacting archaeological remains associated with the assets. Also, the pylon bases and temporary haul roads close to the assets have been geophysically surveyed and, furthermore, due to the archaeological potential of the Fordham Hall Estate, the extent of the Order Limits was geophysically surveyed in the vicinity of assets (4081) and (4082). The survey of the Fordham site has identified enclosures and discrete features likely to be related to the Roman-British building, but these geophysical anomalies, whilst within the Order Limits, lie outside the Project's areas of below ground impact. The geophysical survey of the Fordham site and Stacey's Farm has revealed only anomalies of agricultural (plough scaring), land drain, and natural origin. More details have been developed in HE 2.11 and HE 2.12 in 8.9.2 Applicant's Response to Second Written Questions **[REP5-211]**, ps. 110-116. Furthermore, the Applicant confirms that the Fiddlers Farm (1273588) listed building has been assessed following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment **[Revision D]**. The assessment has been informed by site visits, aerial and street-view imagery. It has been assessed that during the operational phase, there is likely to be a negligible adverse significance of effect on the asset and it would experience Lower Less Than Substantial Harm.

In relation to the AP's concerns regarding the impact of the overhead line on birds, the Applicant notes that a full assessment of ornithological impacts of the Project has been undertaken as part of the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. This assessment has identified and assessed all relevant flight paths and areas of significant ornithological interest in the vicinity of the route. Where necessary, mitigation measures including the installation of bird flight diverters on the overhead line conductors will be implemented in accordance with the commitments set out in **7.4 Outline Landscape and Ecological Management Plan [Revision G]**.

In relation to the AP's concerns about alternative route options, Alternatives were considered (see paragraphs 5.4.136 to 5.4.148 and Figure 5.20 of 7.21 2024 - Design Development Report for the Project **[APP3359]**). In summary alternatives further west would be longer and require more angle pylons and would transfer effects to other similar receptors. In response to feedback other more localised alternatives were also

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Applicant's Response

considered, these included more easterly crossings of the Colne Valley. All such alternatives were substantively constrained to the south of the River Colne due to restrictions presented by residential properties around Fordham Heath and Eight Ash Green, and Fiddlers Wood Ancient Woodland. There are particular constraints at Fordham Bridge where the combination of utility infrastructure, ancient woodland, flood zone and watercourse are considered to preclude overhead line routeing. On this basis these more easterly alternatives were not preferred and were not taken forward

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential to underground additional sections of the Project alignment.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant. For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

The Applicant also notes that the Project's development has been undertaken within the context of the relevant Planning policy, in this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the land or area identified in the AP's objection does not meet the criteria (i.e. it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons' queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons — Appendix A — Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Although not directly related to the Applicant's request for authorisation of CA and TP powers, a number of APs have sought to argue that the future exercise of those acquired rights and consented powers will cause damage to the environment.

In response, the Applicant notes that an Environmental Impact Assessment (EIA) has been undertaken for the Project in accordance with the Infrastructure Planning (EIA) Regulations 2017. The Environmental Impact Assessment is detailed within the Environmental Statement (ES) that was submitted as part of the application for development consent. The ES can be found in Volume 6 of the application documents. The ES assesses the impact of Norwich to Tilbury on a number of topics which are of direct relevance to those holding interests within the Order Land, including: air quality, agriculture and soils, ecology and biodiversity, contaminated land geology and hydrogeology, health and wellbeing, historic environment, hydrology land drainage and flood risk, landscape and visual, noise and vibration, socio-economics recreation and tourism and traffic and transport. The scope of the EIA was set out and agreed within 6.19 Scoping Report — including appendices B to K (Final Issue A) **[APP-296]** and 6.20 Scoping Opinion (Final Issue A) **[APP-297]**.

Where potential effects on the environment have been anticipated, mitigation has been designed to avoid, prevent, reduce and offset impacts. Mitigation measures are set out and secured in 7.2 Outline Code of Construction Practice (Final Issue E) **[REP5-139]**, 7.3 Outline Construction Traffic Management Plan (Final Issue D) **[REP5-149]**, 7.4 Outline Landscape and Ecological Management Plan (Final Issue E) **[REP5-157]**, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Final Issue B) **[REP5-161]** and Outline Public Rights of Way Management Plan (Final Issue C) **[REP5-163]**. Residual

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

effects (following the implementation of mitigation measures) of the Project are set out in each individual environmental statement topic chapter. Residual effects are stated to be significant or not-significant in accordance with the methodology the assessments have been undertaken in accordance with.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 — Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

231. AP 231 - Robert Gray Farming Contractors Ltd

231.1 Person with Interest in Land (PIL) Reference ID: 10555

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our objections are as follows: • National Grids failure to consider alternatives for their project, there are less intrusive options • The land is not necessary for the scheme, alternative routes could avoid acquisition of these rights. • The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. • Pre-application-there has been insufficient detailed preparatory work by National Grid prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward • Inadequate engagement or negotiation-we have been trying to address with National Grid the issue of the proposed	Summary of Objection The Applicant understands that Robert Gray Farming Contractors Ltd holds an interest in land within the Project Order Limits by way of occupation and freehold. The objection raised by Robert Gray Farming Contractors Ltd concerns, in summary: the Applicant's failure to consider alternatives and less intrusive options for the Project; the assertion that the land is not necessary for the scheme and that alternative routes could avoid acquisition of the relevant rights; the contention that private loss and human rights impacts outweigh the public benefit with significant harm to landowners, businesses and livelihoods; insufficient pre-application preparatory work prior to the DCO application; inadequate engagement and negotiation with the Applicant; a lack of a compelling case in the public interest; concerns about whether affected parties will receive fair compensation; and the position that despite negotiations no Heads of Terms for a voluntary agreement have been agreed. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which Robert Gray Farming Contractors Ltd holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
power lines crossing our land with little feedback • Lack of compelling case in the public interest-National Grid has not demonstrated a sufficiently strong justification for the project • Compensation issues-we have concerns about whether affected parties will receive a fair compensation • Heads of Terms-despite negotiations with the National Grid no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement	The Applicant can confirm that a site meeting was held with the landowner and their agent on 4th June 2026 to discuss accommodation works and mitigation. Accommodation matters have been recorded on the LIRA and are being reviewed. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 19 June 2026. In respect of the routing and siting concerns raised, the Applicant notes that to the east of the Order Limits there is Hapton Common County Wildlife Site which sits at the bottom of the valley. There is an angle pylon to the north of the area to change the overhead line route to a more southerly direction. There is a listed building and residential properties on Fundenhall Road at that point and if the route was to move to the edge of the valley, it would lie very close to that property and would require multiple angle pylons to route it back to the alignment proposed further down in the valley. Whilst the Applicant does agree that going into the valley would be more compliant with Holford Rule 5, it would conflict with Holford Rule 2 and the supplementary notes, and that it brings impacts potentially on to that county wildlife site and on other residential receptors and the listed building. Further information concerning specific routing and siting considerations relevant to the land interest(s) of this Affected Person may be found in the following documents within the Examination Library: 5.1 Consultation Report [APP-066] Ref no. 10-22.46 in Table 10-22; 5.15 Design Development Report [APP-122] paragraph 4.3.1 to 4.3.5 (pages 40–41); 7.20 2023 – Design Development Report for the Project [APP-358] paragraph 5.5.13 (page 36); and 7.21 2024 – Design Development Report for the Project [APP-359] paragraph 5.4.20 to 5.4.22 (page 41) and Figure 5.3 (page 42). A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

232. AP 232 - ARU Writtle (Writtle University College, Anglia Ruskin University)

232.1 Person with Interest in Land (PIL) Reference ID: 7116, 28443

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
ARU Writtle (F1201D065, NTOT-AFP2247) is described in the Lands Right Tracker and the Schedule of Affected Persons as "Writtle University College" (PIL 7116) and "Anglia Ruskin University Higher Education Corporation" (PIL 28443). ARU Writtle's objection centres on the legal requirement that compulsory acquisition powers in a Development Consent Order (DCO) must be necessary, justified, and supported by a compelling public interest case, and that National Grid Electricity Transmission (NGET) has failed to meet those standards in relation to ARU Writtle's land and most notably Plot 8/42. The objection relies on the statutory tests in particularly the emphasis on necessity, proportionality, and consideration of alternatives. NGET have failed to satisfy Section 122(2) and 123 PA 2008 through lack of necessity or requirement as the purpose of CA Plot 8/42 can be achieved through powers already included in the draft	Summary of Objection The objection raised by ARU Writtle (described in the Land Rights Tracker and Schedule of Affected Persons as "Writtle University College" (PIL 7116) and "Anglia Ruskin University Higher Education Corporation" (PIL 28443)) raises wide-ranging concerns in relation to the compulsory acquisition powers sought by the Applicant, with particular focus on Plot 8/42. In summary, ARU Writtle objects on the basis that the Applicant has not satisfied the statutory tests under Sections 122(2) and 122(3) of the Planning Act 2008 in relation to necessity and the compelling public interest case, specifically because the purpose of acquiring Plot 8/42 can be achieved through powers already included in the draft DCO, TROs and road closures. ARU Writtle further contends that the compulsory acquisition is unnecessary as the scheme can proceed without interfering with its land rights, that the Application creates a logical contradiction regarding access and scaffolding, and that there are alternative access routes available. The objection also raises concerns regarding severe disruption to a nationally significant education and research facility (in particular the Equine Unit), unacceptable health and safety risks arising from construction traffic, incompatibility with equine welfare and animal safety, loss of essential grazing, irreplaceable educational harm, significant financial and reputational damage, increased traffic and access pressures (including on Cow Watering Lane), and environmental and ecological impacts including ground disturbance, soil compaction and habitat fragmentation. These matters are set out in ARU Writtle's written submissions REP1-200, REP3-117 and REP4-348.

Please summarise (in no more than 1500 words) the reason(s) for your objection

DCO, TRO's and road closures. Failure in relation to Section 122(3) that there is no compelling case in the public interest as the scheme can proceed without interfering with ARU Writtle's land rights and the acquisition is therefore disproportionate and unnecessary.

The Application creates a logical contradiction; if traffic is excluded, scaffolding access becomes unnecessary and if alternative access exists, additional rights are duplicative. The statutory tests cannot be satisfied.

In relation to the Government Guidance ARU Writtle argues that the guidance requires a clear justification that land is needed for the scheme, but that the presence of alternative access routes and powers shows no genuine need. There is a lack of proper consideration of alternatives. The guidance stresses that interference with private rights must be no more than necessary but acquiring Plot 8/42 exceeds what is required, especially where the objective can be achieved via less intrusive means and the impact of access and use of Plot 8/42 is so impactful on ARU Writtle.

Severe disruption to a nationally significant education and research facility. The proposed overhead line and construction access directly affect ARU Writtle's Equine Unit, which underpins teaching, research,

Applicant's Response

Land Rights Sought

The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest.

Consolidated Response The Applicant has provided further detail ref 2.1 in **8.31 Response to Rule 17 letter Received 14th July 2026** which signposts to the detail in the Deadline 6 submissions of these Affected Parties in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6. Please note that the response to ARU Writtle [REP6-134] is provided in F of the document.

In relation to the matter of access through the college (Plot 8/42), the Applicant can confirm that it had been in discussions with Essex County Council regarding alternative access arrangements and at the Compulsory Acquisition Hearing 3 (CAH3) was able to confirm that an alternative access has been accepted by Essex County Council. This means that the Applicant no longer requires access through the college via Plot 8/42. Plot 8/42 will accordingly become Class 8 land and will be excluded from active acquisition. The Applicant does not agree that the Project would result in severe disruption to ARU Writtle's educational and research activities. The Environmental Statement assessed ARU Writtle as an educational facility and concluded that impacts would be temporary, minor adverse and not significant, with access to operational buildings maintained throughout construction. The overhead line oversails only a very small proportion of the wider estate and does not affect the core teaching, research or operational facilities.

The Applicant has developed the Project in accordance with the measures secured through the Outline Code of Construction Practice and associated construction management plans. These include requirements for safe construction working practices, traffic management and ongoing stakeholder engagement during construction. Access arrangements will be managed to maintain safe operation of the site throughout the works, and the Applicant

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
industry collaboration and student placements across agriculture, animal sciences and equine studies. Unacceptable health and safety risks Construction traffic and works would pass through the Equine Centre, close to stables, teaching rooms, parking areas and riding arenas, creating serious risks to students (including under 18s), staff and horses, and obstructing emergency access and evacuation routes. Incompatibility with equine welfare and animal safety Horses are highly sensitive to noise, machinery, vibration and EMFs. Overhead lines above grazing paddocks would render fields unusable, increase stress and health risks, force prolonged stabling and compromise animal welfare. Loss of essential grazing and long term operational constraints Construction and reinstatement would lead to extended loss of safe equine grazing, with paddocks taking 12+ months to become suitable again, causing enduring disruption beyond the construction phase. Irreplaceable educational harm Practical, hands on learning is fundamental to 17 FE, undergraduate and postgraduate programmes. Current proposals would prevent safe delivery of assessments, clinical exams and required contact hours, risking	continues to engage with ARU Writtle to identify proportionate measures to minimise disruption where reasonably practicable. In relation to EMF and microshocks, the Applicant has provided a response in 8.4.11.1 Applicant's Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2 [REP5-193], where it is stated that National Grid follows the voluntary code of practice on how electricity companies should manage microshocks and has applied this approach to the relevant plots to reduce the EMF to below the threshold contained in the guidance. The Applicant considers that the direct impact of the overhead line span on ARU Writtle is limited. The overhead line oversails only a very small proportion of the western paddock area and does not pass through the operational buildings, teaching facilities, stables or principal circulation routes within the Equine Facility. The Applicant does not agree that the Project would result in the loss of essential grazing land or significant long-term operational constraints. Any acquisition of land or rights would be subject to compensation in accordance with the Compensation Code. A detailed response to the comments raised by ARU Writtle has been provided in 8.4.11.1 Applicant's Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2 [REP5-193]. In relation to socio-economic and educational impacts, 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C] concludes that, although there would be a minor temporary loss of elements of the site, adequate access to operational buildings would be retained at all times during construction; this results in a temporary, short-term, minor adverse and not significant level of effect. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
non compliance with regulatory and accreditation requirements. Significant financial and reputational damage. Expected losses include reduced tuition income, additional stabling and veterinary costs, disruption to loan horse schemes, cancellation of external clinics and competitions, and long term reputational harm affecting recruitment, retention and partnerships. Increased traffic and access pressures Construction traffic would intensify pressures on narrow single-track routes (including Cow Watering Lane), exacerbating congestion, safety risks and disruption at peak times. Environmental and ecological impacts The proposed acquisition would result in avoidable disturbance to undeveloped paddock land that is not being mitigated. It will introduce additional ground disturbance, soil compaction, loss of vegetation, fragmentation of paddock habitats and dangers to horses and humans introducing cumulative long term environmental and ecological impacts and effects. Overall The compulsory acquisition is unnecessary and is not the least intrusive option. The Secretary of State cannot lawfully include Plot 8/42 in the DCO because, section	alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
122(2) is not satisfied (no necessity), and section 122(3) is not satisfied (no compelling case). Consent should only be granted for development that is "required". Plot 8/42 is not "required", so it must be excluded. This is set out in full in ARU Writtle's written submissions REP1-200, REP3-117, REP4-348.	The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered. Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

233. AP 233 - Robert Gray

233.1 Person with Interest in Land (PIL) Reference ID: 14200

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Our Objections are as follows: • National Grids failure to consider alternatives for their project, there are less intrusive options • The land is not necessary for the scheme, alternative routes could avoid acquisition of these rights. • The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. • Pre-application-there has been insufficient detailed preparatory work by National Grid prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward • Inadequate engagement or negotiation-we have been trying to address with National Grid the issue of the proposed power lines crossing our land with little feedback	Summary of Objection The Applicant understands that Robert Gray holds an interest in land within the Project Order Limits by way of occupation. The objection raised by Robert Gray concerns, in summary: the Applicant's failure to consider alternatives and less intrusive options for the Project; the assertion that the land is not necessary for the scheme and that alternative routes could avoid the acquisition of these rights; the contention that the private loss and human rights impact due to the proposed project outweighs the public benefit, with significant harm to landowners, businesses and livelihoods; insufficient pre-application preparatory work prior to the DCO application; inadequate engagement and negotiation with the Applicant, including the proposed power lines crossing their land; a lack of a compelling case in the public interest; concerns about whether affected parties will receive fair compensation; and the absence of agreed Heads of Terms for a voluntary agreement. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which Robert Gray holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• Lack of compelling case in the public interest-National Grid has not demonstrated a sufficiently strong justification for the project • Compensation issues-we have concerns about whether affected parties will receive a fair compensation • Heads of Terms-despite negotiations with the National Grid no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement	The Applicant can confirm that a site meeting was held with the landowner and their agent on 4th June 2026 to discuss accommodation works and mitigation. Accommodation matters have been recorded on the LIRA and are being reviewed. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 19 June 2026. In respect of the routing and siting concerns raised, the Applicant notes that to the east of the Order Limits there is Hapton Common County Wildlife Site which sits at the bottom of the valley. There is an angle pylon to the north of the area to change the overhead line route to a more southerly direction. There is a listed building and residential properties on Fundenhall Road at that point and if the route was to move to the edge of the valley, it would lie very close to that property and would require multiple angle pylons to route it back to the alignment proposed further down in the valley. Whilst the Applicant does agree that going into the valley would be more compliant with Holford Rule 5, it would conflict with Holford Rule 2 and the supplementary notes, and that it brings impacts potentially on to that county wildlife site and on other residential receptors and the listed building. Further information concerning specific routeing and siting considerations relevant to the land interest(s) of this Affected Person may be found in the following documents within the Examination Library: 5.1 Consultation Report [APP-066] Ref no. 10-22.46 in Table 10-22; 5.15 Design Development Report [APP-122] paragraph 4.3.1 to 4.3.5 (pages 40–41); 7.20 2023 – Design Development Report for the Project [APP-358] paragraph 5.5.13 (page 36); and 7.21 2024 – Design Development Report for the Project [APP-359] paragraph 5.4.20 to 5.4.22 (page 41) and Figure 5.3 (page 42). A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

234. AP 234 - Deborah Smith, Andrew Donald Smith

234.1 Person with Interest in Land (PIL) Reference ID: 3398

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I do not give any permission relating to my property relating to this scheme. The scheme is environmentally detrimental, personally financially detrimental. This is my land. I am already disadvantaged by this scheme so I am totally against it in every way. I do not have any permissions.	Summary of Objection The Applicant understands that Deborah Smith / Andrew Donald Smith hold interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by this Affected Person is that they do not give any permission relating to their property in connection with the scheme. The objection states that the scheme is both environmentally and personally financially detrimental to them. The Affected Person emphasises that this is their land and that they are already disadvantaged by the scheme and are therefore totally against it in every way. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant can confirm that a meeting was held with the Affected Person and their representatives on 23 January 2026 regarding practical matters associated with the Project. Version 2 of the Heads of Terms were issued on 9 April 2026, and the Applicant remains in dialogue with the Affected Person's agent to negotiate the Heads of Terms, and remains committed to reaching a voluntary agreement. The Affected Person's

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

representatives attended an Agent's Group meeting with Fisher German and National Grid on 4 June 2026.

UK Power Networks have had correspondence with Mr Smith's agent and intend to host a Teams meeting with the agent further to the design for the UK Power Networks works having been shared. UK Power Networks support the position that both parties are working to reach voluntary agreement on the land rights required, and further to a successful resolution compulsory acquisition will not be required.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

235. AP 235 - Richard Long Limited

235.1 Person with Interest in Land (PIL) Reference ID: 10556

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
The objections to the interference with land rights are summarized as follows • The Applicant's failure to consider alternatives for their project, less intrusive options exist. • The land is not necessary for the scheme, alternative designs or routes could avoid acquisition of these rights. • The private loss and human rights impact due to the proposed project outweighs the public benefit with significant harm to landowners, business and livelihoods. • Pre-application-there has been insufficient detailed preparatory work by the Applicant prior to the DCO application both in consulting landowners and considering alternative routes and design changes which have been put forward • Inadequate engagement or negotiation-we have been trying to address with the Applicant the issue of the proposed power lines crossing the land with little feedback from the Applicant	Summary of Objection The Applicant understands that Richard Long Limited holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by Richard Long Limited concerns, in summary: the Applicant's failure to consider alternatives and less intrusive options for the Project; the assertion that the land is not necessary for the scheme and that alternative designs or routes could avoid acquisition of these rights; the contention that the private loss and human rights impact outweighs the public benefit with significant harm to landowners, businesses and livelihoods; insufficient pre-application preparatory work prior to the DCO application both in consulting landowners and considering alternative routes and design changes; inadequate engagement and negotiation with the Applicant regarding the proposed power lines crossing their land; a lack of a compelling case in the public interest; concerns about whether affected parties will receive fair and timely compensation; and the absence of agreed Heads of Terms for a voluntary agreement. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which Richard Long Limited holds an interest: Class 2 (overhead line infrastructure) and Class 5 (access). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant can confirm that a site meeting was held with the landowner and their agent on 4th June 2026 to discuss accommodation works such as crossing points and pylon siting. Accommodation matters have been recorded on the LIRA and are being reviewed. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 19 June 2026.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
• Lack of compelling case in the public interest-the Applicant has not demonstrated a sufficiently strong justification for the project • Compensation issues-we have concerns about whether affected parties will receive fair and timely compensation • Heads of Terms-despite negotiations with the Applicant no heads of terms for a voluntary agreement are agreed, again due to a lack of engagement from the Applicant	In respect of the routing and siting concerns raised, the section of overhead line is between RG18, which is an angle pylon, and RG19. There are two blocks of woodland (the one to the east is also Norton's Wood County Wildlife Site) adjacent to either side of span RG18 to RG19 which oversails the eastern edge of the solar farm, which fills the gap between the blocks of woodland. The Applicant considered alternatives that diverted slightly to the east and to the south, but these would go through the woodland with various ecology concerns. It would also take the alignment in a more southerly direction, directly towards the Grade II* listed Flordon Hall. The Applicant also considered routeing further west but given the layout of the solar development in between the blocks of woodland, this would require a significant diversion routeing west and then directly south back to the alignment with additional angle pylons required. This was considered to be less compliant with the Holford Rules. The Applicant notes that no pylons are proposed within the site itself and it would be an oversail of the panels from the conductors in the operational phase, which is not uncommon across the network. The Applicant has included an aspirational commitment register which already contains an aspirational commitment for pylon RG18, where the Applicant would seek to avoid the pylon being moved further south into the solar site (reference ADDR-3 in Appendix F of 8.4.14 Applicant's Comments on any Further Information or Submissions Received [REP6-114]). It would also undertake further micro-siting of the haul road, to move this as close to the east as possible, keeping the relevant distances from the root protection zones from the woodland. There is a slight encroachment on that eastern side of the solar farm, but the Applicant has sought to keep the impact as far to the east of that development as possible. The Holford Rules guide the routeing and where possible, the Applicant seeks to avoid all woodland and given the oversail, this was considered to be the right balance at this location given the other factors considered. The Applicant has tried to reduce the impact of the haul road location, with positioning as far east as practicable. The Applicant is also looking at whether the conductor pulling area and the exclusion zone are required during construction or in maintenance, and is seeking further design information from its construction partners. The Applicant is continuing to discuss the proposals as part of the Statement of Common Ground and there have been regular meetings in this regard. Further information concerning specific routeing and siting considerations relevant to the land interest(s) of this Affected Person may be found in the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

following documents within the Examination Library: 5.1 Consultation Report **[APP-066]** Ref no. 9-3.148 in Table 9-3; 5.15 Design Development Report **[APP-122]** paragraph 4.2.4 (page 39) and Figure 4.2 on page 40; 7.21 2024 - Design Development Report for the Project **[APP-359]** paragraphs 5.4.17 to 5.4.19 (page 40) and Figure 5.2 on page 41; and ADDR-3 within Appendix D. Supplement 5 – ALT 1.8 – CA 1.21 Additional Detailed Design Requests (page 1) of 8.9.1 Applicant's Responses to First Written Questions **[REP3-074]**.

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

236. AP 236 - Joe Hearnden, BTF Partnership on behalf of the Cole Family

236.1 Person with Interest in Land (PIL) Reference ID: The Cole Family, (multiple references,, see RR-3629 for list, of Aps) 6205 James Andrew Cole

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
The Applicant has failed to demonstrate that the compulsory acquisition of the Affected Person’s specific land or rights is strictly necessary to deliver the scheme. The inclusion of the Affected Person’s property appears to be driven by a desire for flexibility or contingency rather than a clearly evidenced requirement. The Application lacks justification as to why the Affected Person’s land is essential, nor any evidence that the scheme could not proceed with a reduced land take or alternative configuration. The extent of the rights sought is disproportionate to the needs of the Scheme. The Applicant appears to be seeking permanent rights or outright acquisition in circumstances where temporary access or limited rights would be sufficient. The proposals do not demonstrate that impacts on the Affected Person’s property have been	Summary of Objection The objection raised by Joe Hearnden, BTF Partnership on behalf of the Cole Family raises a number of concerns in relation to the compulsory acquisition powers sought by the Applicant. In summary, the Cole Family contend that: the Applicant has failed to demonstrate that the compulsory acquisition of their specific land or rights is strictly necessary to deliver the scheme; the extent of the rights sought is disproportionate and imposes excessive interference with the use and enjoyment of the land, including long-term constraints, potential loss of value and disruption to access or operations; there has been an inadequate consideration of reasonable alternatives including different route alignments, layouts and design refinements; there are concerns regarding the deliverability of the scheme, including uncertainty around secured funding and necessary consents; the Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement; there are concerns regarding compliance with procedural and legal requirements; and that the compensation framework fails to strike a fair balance under Human Rights legislation. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 1 (compulsory acquisition of land), (b) Class 2 (overhead line infrastructure), (c) Class 3 (underground cable infrastructure), (d) Class 4 (overhead line and underground cable infrastructure), (e) Class 5 (access), (f) Class 6 (Drainage). The Applicant is seeking to acquire the following permanent rights for UKPN over

Please summarise (in no more than 1500 words) the reason(s) for your objection

minimised and instead impose excessive interference with the Affected Person's use and enjoyment of the land. This includes long-term constraints on use, potential loss of value, and disruption to access or operations. Such interference fails to strike a fair balance between private rights and public benefit.

There has been an inadequate consideration of reasonable alternatives. The Applicant has not meaningfully explored different route alignments, layouts, or design refinements that could avoid or reduce impacts on the Affected Person's property. Without a transparent and reasoned assessment of alternatives, it cannot be concluded that the current proposals represent the least intrusive solution or the which is most effective at delivering on the public need. This omission significantly weakens the justification for a Development Consent Order.

There are concerns regarding the deliverability of the scheme. Uncertainty remains where Objectors often point to a lack of secured funding, necessary consents, and the realism of the proposed programme. Where delivery is not clearly secured, it is inappropriate to authorise compulsory acquisition powers that may result in land being taken or rights being restricted without the Scheme proceeding as anticipated.

Applicant's Response

land in which this AP holds an interest: (a) Class 1 (compulsory acquisition of land), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

A site meeting was held on 6 May 2026, at which Heads of Terms were discussed as well as options for alignment south of the Tilbury substation and routing and siting of towers TB245 and TB248–253. The interactions with the land and option areas for Bloor Homes and Lower Thames Crossing were also discussed. It was agreed that a constraints plan would be provided to show the interaction. The Applicant is conducting a land plan reduction exercise as part of the Heads of Terms process and, once this is completed, this will be provided to the affected persons for review. UKPN have also been asked to contact the relevant parties to engage.

The Applicant does not agree that there has been inadequate consideration of reasonable alternatives and design refinements. Throughout the development of the Project, numerous meetings have taken place between representatives of the Cole Family, their appointed agent at BTF Partnership, and members of the Project team. These meetings have provided opportunities for open dialogue, allowing the Cole Family and their agent to raise questions, provide feedback, and discuss matters pertinent to their interests and the ongoing Project works. The feedback received during these meetings, as well as through the various stages of consultation, including design change requests, has been carefully considered by the Project team and responses provided. With regards to specific changes to the route that were suggested by the Cole Family, the Applicant has included a commitment (GG34) within the 7.2 Outline Code of Construction Practice **[Revision B]** to move pylon TB245 north as far as possible. This aims to reduce heritage effects and position the pylon to the edge or outside what are reported as the main views to the west. This response was included in 5.1 Consultation Report **[APP-066]**, which includes responses to feedback submitted prior to the DCO submission. The applicant is also exploring other means to reduce the effects on farming activity.

Please summarise (in no more than 1500 words) the reason(s) for your objection

These uncertainties undermine the claimed public interest case.

The Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement. Engagement to date has been limited and has not amounted to meaningful negotiation. The Applicant has proposed Heads of Terms for the rights and interests being sought, but are unable or unwilling to alter or amend the terms sufficiently for parties to resolve disputes or reach points of common ground. In particular, there has been insufficient effort to reduce the extent of acquisition or to explore less intrusive options through discussion. The Affected Person does not believe that the Applicant has reached the required threshold to justify the use of compulsory acquisition powers as a measure of last resort.

There are concerns regarding compliance with procedural and legal requirements. The justification for the inclusion of the Affected Person's land, and for the specific rights sought, has not been clearly or adequately articulated. To the extent that the Order seeks powers beyond what is necessary or lacks sufficient precision, it risks exceeding statutory limits. The panel of Examining Inspectors must be satisfied that all legal requirements are fully and properly met, which does not appear to be the case.

Applicant's Response

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public

Please summarise (in no more than 1500 words) the reason(s) for your objection

The compensation framework concerning the full extent of impacts, including injurious affection, disturbance, and long-term restrictions on the use of the Affected Person's property is inadequate or fails to strike a fair balance under Human Rights legislation. While compensation cannot justify unnecessary acquisition, the framework must still ensure affected parties are treated fairly, which has not been convincingly demonstrated.

Applicant's Response

interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2)

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

237. AP 237 - Joe Hearnden, BTF Partnership on behalf of the Brice Family

237.1 Person with Interest in Land (PIL) Reference ID: The Brice Family, (multiple references, see RR-3626 for list, of Aps)

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant’s Response
The Applicant has failed to demonstrate that the compulsory acquisition of the Affected Person’s specific land or rights is strictly necessary to deliver the scheme. The inclusion of the Affected Person’s property appears to be driven by a desire for flexibility or contingency rather than a clearly evidenced requirement. The Application lacks justification as to why the Affected Person’s land is essential, nor any evidence that the scheme could not proceed with a reduced land take or alternative configuration. The extent of the rights sought is disproportionate to the needs of the Scheme. The Applicant appears to be seeking permanent rights or outright acquisition in circumstances where temporary access or limited rights would be sufficient. The proposals do not demonstrate that impacts on the Affected Person’s property	Summary of Objection The objection raised by Joe Hearnden, BTF Partnership on behalf of the Brice Family raises a number of concerns in relation to the compulsory acquisition powers sought by the Applicant. In summary, the Brice Family contend that: the Applicant has failed to demonstrate that the compulsory acquisition of their specific land or rights is strictly necessary to deliver the scheme; the extent of the rights sought is disproportionate and imposes excessive interference with the use and enjoyment of the land; there has been an inadequate consideration of reasonable alternatives including different route alignments and design refinements; there are concerns regarding the deliverability of the scheme including uncertainty around secured funding and necessary consents; the Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement; there are concerns regarding compliance with procedural and legal requirements; and that the compensation framework fails to strike a fair balance under Human Rights legislation. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this AP holds an interest: (a) Class 2 (overhead line infrastructure), (b) Class 3 (underground cable infrastructure), (c) Class 4 (overhead line and underground cable infrastructure), (d) Class 5 (access). The Applicant is seeking to acquire the following permanent rights for UKPN over land in which this AP holds an interest: (a) Class 3 (underground cable infrastructure) (b) Class 4 (overhead line and underground cable

Please summarise (in no more than 1500 words) the reason(s) for your objection

have been minimised and instead impose excessive interference with the Affected Person's use and enjoyment of the land. This includes long-term constraints on use, potential loss of value, and disruption to access or operations. Such interference fails to strike a fair balance between private rights and public benefit.

There has been an inadequate consideration of reasonable alternatives. The Applicant has not meaningfully explored different route alignments, layouts, or design refinements that could avoid or reduce impacts on the Affected Person's property. Without a transparent and reasoned assessment of alternatives, it cannot be concluded that the current proposals represent the least intrusive solution or the which is most effective at delivering on the public need. This omission significantly weakens the justification for a Development Consent Order.

There are concerns regarding the deliverability of the scheme. Uncertainty remains where Objectors often point to a lack of secured funding, necessary consents, and the realism of the proposed programme. Where delivery is not clearly secured, it is inappropriate to authorise compulsory acquisition powers that may result in land being taken or rights being restricted without the Scheme proceeding as anticipated.

Applicant's Response

infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this AP holds an interest. Certain parcels of land in which the AP holds an interest also fall within Class 8 (land where no powers of compulsory acquisition or temporary possession are sought).

Consolidated Response

A Heads of Terms meeting was held on site on 2nd June 2026 with the Affected Person and their agent, Joe Hearnden, to discuss the proposed route. The Brice Family's biggest concern relates to the proposed solar farm, and the Applicant acknowledges this.

Amendments to pylon locations are being implemented to minimise the impact, and ongoing discussions are being held with the Affected Person to confirm locations.

In respect of the alternatives considered, the Applicant considered multiple alternative alignments with respect to the Affected Person's land. However, alternatives to the north would increase effects on the grade II* Rivenhall Place and residential properties on Park Road. Alternatives to the south would transfer effects to residential properties and a grade II listed building along and east of Church Road. The Applicant and its delivery partners are looking into moving pylon TB94 west so that it is positioned to the west of the solar farm, as recognised in ADDR-81 of the Additional Detailed Design Requests (Appendix B of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline for D7).

The applicant continues to consider the appropriate means to seek to avoid the haul road affecting the solar farm to further reduce effects (reference ADDR-103).

A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed.

In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of

Please summarise (in no more than 1500 words) the reason(s) for your objection

These uncertainties undermine the claimed public interest case.

The Applicant has not demonstrated that it has taken reasonable steps to acquire the required land or rights by agreement. Engagement to date has been limited and has not amounted to meaningful negotiation. The Applicant has proposed Heads of Terms for the rights and interests being sought, but are unable or unwilling to alter or amend the terms sufficiently for parties to resolve disputes or reach points of common ground. In particular, there has been insufficient effort to reduce the extent of acquisition or to explore less intrusive options through discussion. The Affected Person does not believe that the Applicant has reached the required threshold to justify the use of compulsory acquisition powers as a measure of last resort.

There are concerns regarding compliance with procedural and legal requirements. The justification for the inclusion of the Affected Person's land, and for the specific rights sought, has not been clearly or adequately articulated. To the extent that the Order seeks powers beyond what is necessary or lacks sufficient precision, it risks exceeding statutory limits. The panel of Examining Inspectors must be satisfied that all legal requirements are fully and properly met, which does not appear to be the case.

Applicant's Response

negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs.

Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the

Please summarise (in no more than 1500 words) the reason(s) for your objection

The compensation framework concerning the full extent of impacts, including injurious affection, disturbance, and long-term restrictions on the use of the Affected Person's property is inadequate or fails to strike a fair balance under Human Rights legislation. While compensation cannot justify unnecessary acquisition, the framework must still ensure affected parties are treated fairly, which has not been convincingly demonstrated.

Applicant's Response

criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

238. AP 238 - David William Salmon

238.1 Person with Interest in Land (PIL) Reference ID: 5741

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
We object to the NG Norwich to Tilbury pylon route and especially its lack of engagement with ourselves over the impacts to our business and land holding during the so called 'consultation and engagement meetings'. In particular we object to the following points:- • Lack of meaningful engagement and information sharing, in particular information regarding our irrigation reservoir with active fishing club in Ardreigh (Drawing AENC-TQST-LAN-DWG-0002 parcel ref 17/39) Initially ignoring our feedback regarding our angling club and then not answering questions about the future of angling on the lake, which we now understand will be prohibited completely. • Lack of meaningful engagement regarding the permanent private access road- we have had to feedback on designs at meetings where information is so lacking that our	Summary of Objection The Applicant understands that David William Salmon holds interests in land within the Project Order Limits by way of freehold, occupation, restrictive covenants and easement. The objection raised by David William Salmon concerns, in summary: a lack of engagement from the Applicant regarding the proposed access road location (including his request that the access road be positioned at the far edge of his field) and the decision not to accommodate this preference; the assertion that the routing of the access road was agreed without adequately consulting him and that the proposed route transfers effects onto his land; concerns about shared use of the wind farm access road and whether he and other users will retain access rights to and from the road; the cumulative impact of the Project on Hall Farm; and the absence of agreed Heads of Terms for a voluntary agreement, notwithstanding negotiations that have taken place. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 1 (compulsory acquisition); Class 2 (overhead line infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant can confirm that it has met with the Affected Person's representative multiple times to negotiate and progress the Heads of Terms, with the most recent meeting having

Please summarise (in no more than 1500 words) the reason(s) for your objection

response has been limited. Even with the 2 rounds of variations the engagement was very one sided resulting in each variation being more detrimental to our business than the previous iteration. We provided multiple rounds of feedback and if only the designers consulted with us in a 2 way dialogue a design which sterilises less of our land and has a smaller impact could have been found. As it stands we are still un-clear of how we will access our field (15/52 on drawing AENC-TQST-LAN-DWG-0002) as our only access route has been severed by the road and the latest route sterilises our land in a long 30m wide slither between road and our boundary.

Lack of information regarding the use of the permanent private access road and the shared temporary wind farm substation construction road. When will they be used and for what? There is no meaningful information on how NG would 'share' the wind farm road, We cannot negotiate or provide feedback if there is no information. They have included all the option routes on the wind farm road and cannot provide clarity of what they intend to do.

Cumulative impact of wind farms and NG on our farmland and residential house at Hall Farm is unacceptable. With 2 haul roads and multiple companies/operators involved the resulting un-certainty and direct impact of

Applicant's Response

been held on 4th June 2026. A meeting was held onsite on 9th June 2026 with the AP, the Applicant and Fisher German, Discussions were held regarding the fishing lake and a request made by the AP for its continued use during construction, This is currently being investigated and a response will be provided.. It is understood that fishing activities will need to cease following the completed installation of the overhead line. Revised terms will be issued shortly and the Applicant continues to engage with the Affected Person's agent. Responses to queries regarding crossing points and compensation matters have been provided to the agent.

In relation to cumulative effects, the applicant has undertaken an assessment of the likely cumulative effects that may arise from the Norwich to Tilbury Project and other existing and, or approved developments. This is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B], 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects (Final Issue A) [APP-284], and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]. As well as assessing the cumulative effects of the Norwich to Tilbury Project with individual other existing and, or approved developments identified in the shortlisting process, the cumulative effects assessment includes an assessment of 'clusters' of other developments, where the Norwich to Tilbury Project has the potential to cause significant cumulative effects in combination with at least two other developments.

In relation to the access road, the Applicant acknowledges the Affected Person's concerns regarding the alignment of the proposed permanent access road, the severance of existing access arrangements, the use of the wind farm access road and the practical operation of future access arrangements. The Applicant has engaged with the Affected Person and their representatives regarding these matters and has considered feedback on a number of design iterations. The Applicant's access strategy seeks, where reasonably practicable, to make use of existing or proposed access infrastructure in order to minimise the extent of new permanent land take and reduce wider environmental effects. The Applicant acknowledges that further detail has been requested regarding the proposed use of the permanent access road and the shared wind farm access route, including the parties that may use those routes and the frequency and duration of such use. These matters continue to be developed and are being progressed through ongoing design work and discussions with affected landowners and third parties.

Please summarise (in no more than 1500 words) the reason(s) for your objection

when/if projects go ahead and the duration of the works will have a significant impact on the farm business, environment and enjoyment of our house(noise/dust/view etc)

- Insufficient negotiation on the HOT's on all general points and especially where the substation haul roads are involved, as information is not available.

In conclusion we feel the lack of negotiation and information being shared is not acceptable and require progress on all of the above points before we would be in agreement with the CA or TP of land rights by NG.

Applicant's Response

The Applicant notes that the permanent access road is required to facilitate operation and maintenance of the Proposed Development following construction, whereas temporary construction access requirements are addressed separately through temporary possession powers and associated construction management controls. The Applicant remains committed to discussing detailed access arrangements, including field access requirements, accommodation works and the interaction with existing farming operations, with a view to minimising impacts on the Affected Person's landholding where reasonably practicable. The Applicant will continue to engage with the Affected Person regarding the detailed design and operation of the access arrangements as those matters progress.

As noted in the 2024 DDR [EN020027-000237-7.21 2024 - Design Development Report for the Project.pdf](#) Paragraph 5.4.126 - These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retain the straighter 2023 preferred draft alignment and oversail the waterbody was preferred although recognising that this would terminate the informal angling arrangements. Compared with angling activities discussed in respect of the lake to the east of Ardleigh, the fishing activity in the water body to the west is more limited and informal and the alternative would have much reduced separation to residential properties hence why a different conclusion is drawn.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RIIO4 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

239. AP 239 - Robert Moore

239.1 Person with Interest in Land (PIL) Reference ID: 4235

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I object to the proposed project for the following reasons: 1) Failure to properly consider alternatives to pylons The applicant has failed to adequately consider alternatives to the use of pylons for this project. Less intrusive options appear to exist, but these have not been properly assessed, explained, or justified. 2) Failure to consider less harmful alternative. The proposal does not demonstrate that the least damaging or least intrusive option has been selected. The applicant has not shown that alternative routes, technologies, mitigation measures, or methods of delivery have been fully explored in order to reduce the impact on affected landowners, businesses, homes, and livelihoods. 3) Disproportionate private loss and human rights impact The proposed project would cause very significant private loss and would have a serious impact on the rights and livelihoods of	Summary of Objection The Applicant understands that Robert Moore holds interests in land within the Project Order Limits by way of freehold and occupation. The objection raised by Robert Moore concerns, in summary: the Applicant's failure to consider alternatives to the proposed route; the disproportionate impact of the scheme on his land and business, in particular the impact on his wedding venue business; the Applicant's perceived inadequate consultation and engagement with him; and the absence of agreed Heads of Terms for a voluntary agreement notwithstanding negotiations that have taken place. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant can confirm that a site meeting was held with the landowner and their agent on 17th June 2026 to discuss accommodation works and mitigation. The main concerns discussed included security, crossing points, severed areas, pylon siting and the impact on the wedding business. Accommodation matters have been recorded on the LIRA and are

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
affected landowners and businesses. In our case, the proposed power lines would cross our farm and would cause substantial harm to our business, including the destruction of a wedding venue, which is the small farm's main source of income. This impact is severe, personal, and disproportionate. The harm to land, businesses, income, and way of life outweighs any public benefit that the applicant claims would arise from the project. 4) Lack of a compelling case in the public interest. The applicant has failed to demonstrate a compelling case in the public interest for this project in its proposed form. There has been insufficient justification for why the project must proceed using pylons, why this route has been selected, and why less intrusive alternatives have not been pursued. 5) Insufficient pre-application work and inadequate consultation Prior to submitting the DCO application, the applicant failed to carry out sufficient detailed preparatory work, particularly in relation to consultation and engagement with affected landowners. 6) We have been trying to address the issue of the proposed power lines crossing our farm with the applicant for three years. Despite this, we have received limited feedback and there has been no meaningful progress towards	being reviewed. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 19 June 2026. In relation to the alternative alignments raised, alternative alignments including routes following valley floors were considered as part of the routeing appraisal. In this location, valley-based alignments would give rise to other significant effects, including increased environmental effects, engineering challenges, land use impacts and additional infrastructure requirements. Such alternatives would also require the route to pass closer to a Grade II listed building than is the case at present, with routeing further constrained by the County Wildlife Site that lies to the east. The preferred alignment represents the Applicant's judgement as to the most appropriate balance of these considerations when assessed against reasonable alternatives. A number of APs have asserted that the Heads of Terms ("HoTs") offered by the Applicant are either not acceptable or not yet sufficiently progressed. In response, the Applicant would reiterate that it has implemented a comprehensive negotiation strategy supported by dedicated land teams. Negotiations are being undertaken at both strategic and individual levels. This approach includes engagement with representative land agents acting for large groups of affected landowners; direct negotiations with individual landowners; ongoing review of land rights requirements; consideration of accommodation works requests; and progression of HoTs towards binding legal agreements. The Applicant has undertaken an extensive, structured and well-resourced programme of negotiations to secure progress on voluntary agreements, engaging with land agents on behalf of 801 APs across 545 HoTs. Engagement has included issuing template HoTs and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues. It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

resolving our concerns. This demonstrates inadequate engagement, poor communication, and a failure to properly consult with those most directly affected.

7) Inadequate engagement and negotiation

The applicant has not engaged with us in a constructive or meaningful way. Given the scale of the impact on our farm and business, we would have expected detailed discussions, proper negotiation, and genuine attempts to reduce or avoid the harm caused. This has not happened. I imagine many other businesses / farms have similar

8) Compensation concerns

We have serious concerns about whether affected parties will receive fair, adequate, and timely compensation. The damage to our business and livelihood would be substantial, and to date there has been no communication from the applicant about how losses will be assessed, how compensation will be calculated, and when compensation would be paid.

9) No heads of terms or voluntary agreement

No heads of terms or voluntary agreement has been signed. This is due to the lack of meaningful engagement and negotiation by the applicant. The absence of agreed terms further demonstrates that the applicant has not properly addressed the impact of the project on our land and business.

The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
For these reasons, I object to the application. I ask that the Examining Authority gives significant weight to the severe impact on our farm, business, livelihood, and property rights, and requires the applicant to properly consider less intrusive alternatives before any consent is granted.	The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[**where**] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

A number of APs have indicated that the Applicant has failed to consider reasonable alternatives, including the potential for an offshore solution to satisfy the existing needs case.

In response, the Applicant refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that it does not support that proposition, noting that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines,

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report **[APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review **[APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.

The Development Consent Order (DCO) Project has been developed in accordance with the Holford and Horlock Rules. The Applicant has used the Environmental Impact Assessment (EIA) to inform the balance and define the proposals taken forward. The Applicant has also received extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from route alternatives, to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1 Consultation Report **[APP-066]** and Design Development Reports **[2025 in APP122, 2024 in APP-359 and 2023 in APP-358]**.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
	Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

240. AP 240 - Parkers Of Leicester Limited

240.1 Person with Interest in Land (PIL) Reference ID: 10218

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
1. Introduction 1.1. These representations are made on behalf of Parkers of Leicester Limited ("POL") and Parker Strategic Land Limited ("PSL") (together, "our clients") in relation to National Grid Electricity Transmission plc ("National Grid")'s application for a Development Consent Order for the Norwich to Tilbury Project (the "Project"). 1.2. POL owns land within the DCO redline boundary ("POL's Land"), identified under the following Land Plot numbers within the DCO Land Plans – Section E [APP-013]: E-2/116, E-2/117, E-2/119, E-2/120, E-2/121, E-2/123, E-2/124, E-2/125, E-2/126, E-2/127, E-2/128, E-3/1, E-3/2, E-3/3, E-3/4, E-3/5, E-3/8, E-3/9, E-3/10, E-3/11, E-3/12, E-3/15, E-3/23, E-3/27 and E-3/29. 1.3. POL's Land forms part of a wider site of approximately 553 hectares ("the Development Site") being promoted by PSL for residential-led mixed use development comprising up to 6,000 new homes and 40ha of employment land. The Development Site	Summary of Objection The Applicant understands that Parkers of Leicester Limited holds interests in land within the Project Order Limits by way of freehold, occupation and easement. The objection raised by Parkers of Leicester Limited is detailed and concerns, in summary: the width of the Limits of Deviation and Order Limits in the relevant location; the contention that the statutory tests under Section 122 of the Planning Act 2008 are not met; the assertion that compulsory acquisition is not being sought as a last resort; the absence of meaningful engagement with Parkers of Leicester Limited as a freeholder; the concern that a southward realignment of the route would be prejudicial to the development potential of the site; the conflict between the Project's proposed route and the mineral rights held by Blackwater Aggregates over the land; and the implications of the proposed route for both the proposed mineral extraction and the adjacent proposed housing development on the freeholder's land. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); and Class 5 (access). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for National Grid in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response

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was recently identified by Braintree District Council as a preferred site in the Regulation 18 consultation on the emerging Braintree Local Plan. Our clients confirm that their objection to the interference with their land rights is maintained in its entirety. 2. Summary of Objections 2.1. Our clients' objections were set out in full in their Relevant Representations. They are summarised below. Inadequate Justification for the Extent of the Order Limits and Compulsory Acquisition 2.2. The DCO application allows for Limits of Deviation ("LoD") representing the maximum locational flexibility for permanent infrastructure. On most land plots the LoD are of a standard width. However, on Plots 3/32, 3/31, 3/28, 3/23, and 3/29, the LoD and Order Limits are significantly wider than elsewhere. No adequate justification has been provided for why the Order Limits on POL's Land must be so wide or of such an unusual shape. Seeking powers with significant flexibility, without demonstrating why such flexibility is essential, is contrary to the fundamental principle that compulsory acquisition powers should only be sought over land demonstrably necessary for delivery of the Project. 2.3. These matters are directly relevant to Section 122 of the Planning Act 2008, which	The Applicant notes that no land meeting has been held to date with Parkers of Leicester Limited. Chasers were sent to the Affected Person's agent, in January 2026 and March 2026. The Applicant understands there are concerns regarding the alignment's impact on both the development potential and the minerals rights over the Affected Person's land, and the Applicant is continuing to pursue the arrangement of a site meeting with the agent. The limits of deviation and Order Limits are wider in this location due to Scenario 5 (Mineral extraction site north-west of Kelvedon (Section E)) as described in Table 4.4 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The Applicant has continued engagement with the Affected Parties post-submission and during the Examination in relation to the design of the overhead line in this location, noting that two competing developments across the same parcel of land are proposed, namely minerals extraction and a mixed use site. Due to the identified route conflict between Blackwater Aggregates' proposed area of mineral extraction and the proposed adjacent housing development undertaken by the freeholder Parkers of Leicester, an additional alignment (Route C) is currently being proposed. This route would be positioned between Routes A and B to better accommodate both parties' interests. The Applicant will engage with Blackwater Aggregates and Parkers of Leicester through detailed design to further refine and confirm this alignment. This update is reflected in 8.11 Approach to Scenarios Revision D. In terms of alternatives to avoid the site altogether, options to the north are restricted by existing minerals extraction sites, grade I and II* linked listed buildings, a sewage works and transfer of effects onto existing residential properties. Alignments further south transfer effects to numerous grade II listed buildings, existing residential properties and a large proposed housing development. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) [REP3-010] which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for

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requires that compulsory acquisition of land is necessary for the purposes of the authorised development. In the absence of plot-specific justification, the applicant cannot demonstrate that the compulsory acquisition of such extensive rights over POL's Land is necessary. This is further at odds with the Department for Communities and Local Government Guidance, Planning Act 2008: Guidance related to procedures for compulsory acquisition (September 2013) ("the Guidance"), which requires acquiring authorities to demonstrate that land take is the minimum required. 2.4. National Grid has stated it is satisfied that all land interests identified for compulsory acquisition and temporary possession are required. However, the Statement of Reasons provides only generic, high-level justification rather than plot-specific analysis. There is no detailed explanation of why each individual plot is necessary, whether less intrusive alternatives have been considered, or why the extent of land take is proportionate. This falls short of the Guidance. Failure to Demonstrate Compulsory Acquisition as a Last Resort 2.5. The Statement of Reasons fails to demonstrate that compulsory powers are genuinely a last resort as required by the Guidance. National Grid claims its	Compulsory Acquisition Hearing 1 [REP1-138]) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied. As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013). The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of [REP3-010] makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need. The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession. As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement. The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to

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preference is to secure land rights on a voluntary basis, yet the Statement of Reasons provides no evidence of meaningful negotiations with our clients, no detail on offers made or rejected, and no explanation of why voluntary agreement has not been reached. The Guidance requires acquiring authorities to demonstrate reasonable steps to acquire by agreement. The minimal engagement with our clients demonstrates that the applicant has not treated compulsory acquisition as a last resort. 3. Continuing Inadequacy of Engagement 3.1. The applicant's engagement with our clients has been, and remains, wholly inadequate. Despite the Project having been in planning for a number of years, the applicant has made minimal effort to engage with POL regarding the impact on POL's Land and the Development Site. Our clients have been seeking to engage with National Grid since July 2024 on the potential conflict between the Project and the Development Site. 3.2. Since submitting their Relevant Representations, our clients have continued to seek constructive engagement with National Grid on pylon alignment, mitigation and the interface between the Project and the Development Site. No meaningful progress has been made. National Grid has not engaged substantively with our clients'	areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations. The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement. Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance. Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant. A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met. The Applicant respectfully disagrees with those assertions. As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) [REP3-010], and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [REP5-066], which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
specific concerns, and no Statement of Common Ground has been entered into. This is in stark contrast to the approach taken towards other affected parties – as demonstrated by the detailed Statement of Common Ground with Blackwater Aggregates (Bradwell Quarry). Our clients are entitled to equivalent engagement and have received none. 3.3. The absence of meaningful engagement further demonstrates that the test under the Guidance – that compulsory acquisition must be a genuine last resort – has not been met. 4. National Grid's Proposed Southward Realignment of the Overhead Line and its Prejudicial Impact on the Development Site 4.1. Our clients wish to draw the Examining Authority's attention to a further development that has arisen during the course of the examination, which materially worsens the position for our clients and reinforces their objection. 4.2. As confirmed in National Grid's Draft Statement of Common Ground with Blackwater Aggregates (Bradwell Quarry) (document reference 8.3.27, Revision B, Deadline 4), the applicant has committed to an alternative route scenario that moves pylons TB085 and TB086 further to the south, with TB084 positioned closer to the Order Limits. The applicant has stated that it has committed to this alternative option and	Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context. Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008. Once again, the Applicant respectfully disagrees with those assertions. In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]). In particular, the Applicant repeats the following submission as set out in [REP1-138] (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met." A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means. The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral

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will now progress with it as the preferred scenario. 4.3. This realignment has been made to accommodate the interests of Blackwater Aggregates in relation to the Bradwell Quarry Monks Farm site at Kelvedon, which Blackwater Aggregates seeks to develop for the extraction of sand and gravel. The mineral rights at Monks Farm are owned by Blackwater Aggregates, and the Monks Farm extension is understood to be area A8 (Essex County Council mineral planning department reference site A47). 4.4. The alternative scenario adjusts the overhead line between TB084 and TB087, moving pylons further south within the Order Limits, with the stated purpose of reducing mineral sterilisation within the quarry area. 4.5. Our clients object strongly to this approach for the following reasons. 4.6. First, the southward movement of the overhead line centre line within the Order Limits means that the pylons will have a greater impact on POL's Land and the Development Site, which lies to the south. This directly increases the sterilisation of the Development Site and worsens the interference with our clients' land rights compared to the position as originally proposed. 4.7. Second, the realignment is being made principally to protect the interests of Gent	Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset." For the reasons set out in [REP1-138], the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance. Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project. The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement [REP3-016] clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

Fairhead & Co Limited and Blackwater Aggregates in respect of emerging mineral interests at Monks Farm, Kelvedon. However, the extraction of sand and gravel at Monks Farm is not yet identified in the Minerals Local Plan (being only an emerging allocation at present) and subject to mineral planning consent being granted.

4.8. This means that the mineral extraction interest at Monks Farm has no formal planning status. Yet, the Development Site was voted by Braintree District Council's Local Plan Sub-Committee on 6 October 2025 to be included in the Regulation 18 consultation on the emerging Braintree Local Plan, which identifies it as a potential strategic site for future growth. Braintree are also now moving towards a draft Regulation 19 Local Plan that includes the Development Site.4.9. Third, and critically, the emerging housing allocation on the Development Site should in fact be given greater weight than the mineral interests at Monks Farm, not less. The Development Site represents a critical component of the housing land supply in the emerging Braintree Local Plan. It will be essential to meeting identified local housing need during the plan period. The delivery of up to 5,000 homes on a highly sustainable site adjacent to the railway line and Kelvedon station addresses a national imperative to deliver new housing. National

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Applicant's Response

planning policy gives significant weight to housing delivery.

4.10. By contrast, the Monks Farm mineral interests, whilst of local importance, carries no greater planning status than the Development Site. National Grid's decision to prefer the mineral interest over the housing allocation interest, in a manner that increases the interference with our clients' land rights, is wrong in principle and unjustified on the evidence. It represents the same double standard that our clients have previously objected to: the applicant applies a double standard by providing detailed analysis and mitigation for some emerging allocations whilst either ignoring or, in this case, actively prejudicing others.

4.11. Our clients therefore call upon the Examining Authority to scrutinise National Grid's approach to this realignment as part of its consideration of whether there is a compelling case in the public interest for the interference with our clients' land rights under Section 122 of the Planning Act 2008, and to give proper and proportionate weight to the significance of the Development Site as an emerging allocation for a major strategic housing development.

241. AP 241 - Arqiva Limited

241.1 Person with Interest in Land (PIL) Reference ID: 10301

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
I write in response to your letter of 1st June requesting that Arqiva Limited complete the electronic form provided before deadline 5a and ongoing discussions between Arqiva Limited and representatives of the developer in respect of the matters raised in my objection letter of 11th May 2026 (REP4-347). I wish to update the Planning Inspectorate that Arqiva's Technical Safeguarding Team has now discussed their concerns with representatives from the Norwich to Tilbury Project. Arqiva are expecting the developer to consider how the project impacts their network and suggest potential ways in which impacts can be mitigated. Subject to the conclusion of this discussion, it is the intention that a Statement of Common Ground is provided to the Examination before Deadline 7 (21st July). I would be grateful if you could pass this update to the relevant examining Planning Inspector and I	Summary of Objection The Applicant understands that Arqiva Limited holds an easement interest in land within the Project Order Limits. The objection raised by Arqiva Limited concerns the technical safeguarding implications of the Project for its existing infrastructure. In summary, Arqiva objects on the basis that it expects the Applicant and its contractors to consider the potential impacts on its apparatus and sites, to adhere to Arqiva's published technical safeguarding guidance for transmission sites and masts, and to provide appropriate mitigation where interference with its apparatus arises. Arqiva anticipates the completion and submission of a Statement of Common Ground by Deadline 7 of the Examination (21 July 2026). Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which Arqiva Limited holds an interest: Class 1 (compulsory acquisition); Class 2 (overhead line infrastructure); Class 3 (underground cable infrastructure); Class 4 (overhead line and underground cable infrastructure); Class 5 (access); and Class 6 (substation and cable sealing end compound infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). Powers of temporary possession (Class 7) are also sought for both National Grid and UKPN in connection with the Project over land in which this Affected Person holds an interest. Consolidated Response The Applicant confirms that a final Statement of Common Ground with Arqiva Limited has been submitted at Deadline 7.

Please summarise (in no more than 1500 words) the reason(s) for your objection

anticipate providing a further update in the coming days.

Applicant's Response

A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP"). The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the

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Applicant's Response

Project are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met. With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

Please summarise (in no more than 1500 words) the reason(s) for your objection

Applicant's Response

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "**[where]** proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

242. AP 242 - Susan Wardale

242.1 Person with Interest in Land (PIL) Reference ID: 8927

Please summarise (in no more than 1500 words) the reason(s) for your objection	Applicant's Response
Whole scheme should be underground Alternatives have not been considered Less intrusive options exist Viability of the project There has been inadequate engagement or negotiation	Summary of Objection The objection raised by the AP is that the whole scheme should be placed underground rather than using overhead pylons; the failure to consider alternatives and less intrusive options; the contention that a viable less intrusive route exists; and the assertion that there has been inadequate engagement with the Applicant throughout the process. Land Rights Sought The Applicant is seeking to acquire the following permanent rights for National Grid over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). The Applicant is also seeking to acquire the following permanent rights for UKPN over land in which this Affected Person holds an interest: Class 3 (underground cable infrastructure) and Class 4 (overhead line and underground cable infrastructure). No powers of temporary possession are sought in respect of land in which this Affected Person holds an interest. Consolidated Response The Applicant understands that Susan Wardale holds interests in land within the Project Order Limits by way of freehold and occupation. The Applicant notes that the works relevant to Susan Wardale's land are for UKPN 33 kV wood pole undergrounding works only. The Applicant wishes to address the AP's concern regarding the level of engagement. In respect of the land rights currently sought by the Applicant, the Applicant confirms that no Heads of Terms have been issued by the Applicant to this AP in relation to National Grid's rights, as the affected plots relate solely to UKPN cable mitigation. A number of APs have objected, often in general terms, to the Applicant's request to seek authorisation for powers of compulsory acquisition ("CA") and temporary possession ("TP").

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Applicant's Response

The Applicant refers, in response, to the 4.1 Statement of Reasons (Issue B) **[REP3-010]** which clearly establishes (including at Section 6) why powers of CA and TP are justified in the context of the Project and, in particular, why there is a compelling case in the public interest for land and/or rights to be acquired compulsorily. The Applicant's submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) are also of direct relevance in demonstrating both the need for CA and TP powers (and, by extension, the absence of a suitable alternative) and the fact that all relevant and applicable threshold legislative and policy tests are satisfied.

As those documents together make clear, the Applicant's strong preference on this Project (and indeed on all of its projects) is to acquire land and rights voluntarily. However, given the criticality of the need case underpinning the Project, powers of CA and TP are sought as a necessary fall-back mechanism in the event that voluntary negotiations to acquire land by agreement are unsuccessful in relation to any part of the land. The Applicant submits that its approach in this respect is fully in accordance with extant guidance including, but not limited to, Paragraph 25 of "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013).

The Applicant has explored, and will continue to explore, all reasonable alternatives to the use of CA and TP powers. As Paragraph 6.4.9 of **[REP3-010]** makes clear, the Applicant will only exercise CA and TP powers where it appears that negotiations are unlikely to be completed or to be completed to a timetable which facilitates the delivery of the Project in a manner which avoids stymieing the meeting of a clear, compelling and established national need.

The Applicant notes that some APs have raised concerns as to the extent of land and/or rights sought to be acquired or subject to temporary possession.

As explained in detail by the Applicant in its response to Action No. 1a arising following Compulsory Acquisition Hearing 1 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant's view is that land and rights required for the purposes of the Project are reasonably necessary and at all times have been sought proportionately based

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on the Applicant's experience of other DCOs, including the Bramford to Twinstead Reinforcement.

The Applicant submits that the CA and TP powers sought are proportionate, using a strategy which prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners, while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the cable sealing end compounds and substations.

The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.

Where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.

Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.

A number of APs have asserted that the Applicant has failed to satisfactorily demonstrate that the proposed interference with land and rights is necessary or proportionate and that, as a consequence, the statutory tests under Section 122 of the Planning Act 2008 are not met.

The Applicant respectfully disagrees with those assertions.

As explained at Section 6 of the 4.1 Statement of Reasons (Issue B) **[REP3-010]**, and as further developed in its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), the Applicant considers that the relevant tests set out in Section 122 of the Planning Act 2008 are conclusively met.

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With reference to 4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule **[REP5-066]**, which outlines the specific purpose(s) for which each individual plot of land is required, the Applicant considers it has demonstrated that: (1) all of the Order Land is either required for the Project or is required to facilitate, or is incidental to the Project; and (2) there is a compelling case in the public interest for the land to be acquired compulsorily in order to ensure the Project can be delivered.

Not only has the Applicant adopted a land rights strategy which places significant reliance upon the use of temporary possession powers during construction, with the aim of securing only the smallest necessary permanent land and rights thereafter, but the Applicant has also sought to proactively remove parcels of land from the overall extent of Order Land where it has become apparent, whether through iterative design development or ongoing stakeholder engagement, that there is no longer a justified need to acquire rights or exercise powers over the land parcels in question. The Examining Authority will be fully aware of the widespread deployment of Class 8 ("white land") in this context.

Similar assertions have been made by APs regarding the Applicant's perceived failure to satisfy the statutory test under Section 123 of the Planning Act 2008.

Once again, the Applicant respectfully disagrees with those assertions.

In doing so, the Applicant would draw the Examining Authority's attention to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**). In particular, the Applicant repeats the following submission as set out in **[REP1-138]** (emphasis added): "Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met."

A number of APs have also asserted that the Applicant has failed to act in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of

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land" (MHCLG, 2013) (the "Guidance"). In particular, it is suggested that the Applicant's request to seek authorisation for powers of CA and TP is premature, on the basis that the Applicant has not made adequate attempts to acquire the land and/or rights in question through voluntary means.

The Applicant refers, in response, to its submissions at Compulsory Acquisition Hearing 1 in respect of Agenda Item 3 (captured in full in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**) and, in particular, to its submissions regarding Paragraph 25 of the Guidance. It is worth re-emphasising that, as well as articulating the general rule that CA and TP powers should be a matter of last resort, Paragraph 25 also says that "[where] proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset."

For the reasons set out in **[REP1-138]**, the Applicant considers that it has acted, and continues to act, in full accordance with the Guidance.

Some APs have asserted that the Applicant has failed to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition of land and/or rights required for the purposes of the Project.

The Applicant respectfully disagrees with those assertions and, in doing so, refers to its submissions during Compulsory Acquisition Hearing 1 (summarised in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 **[REP1-138]**), in which the Applicant explained that RII04 funding has already been provided from central government, and the Project has also been designated as an Accelerated Strategic Transmission Investment project which means it is considered to be of the highest criticality from the perspective of Government, Ofgem and other stakeholders. The 4.2 Funding Statement **[REP3-016]** clearly demonstrates that funding will be available for the acquisition of any land and other interests required for the Project, for any compensation or blight claims brought by those interested in the land affected by the DCO, and for the costs of implementing the Project.

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