AENC-NG-CNS-REP-0390

Norwich to Tilbury

Volume 8: Examination Documents

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Contents

Executive summary

Purpose of this report

On the 14 July 2026, the ExA issued a **Rule 17 Letter [PD-031]** with a Request for further information relating to: the Development Consent Order; compulsory acquisition and temporary possession of land and rights; biodiversity, ecology and the natural environment; the historic environment; land use, soils and green infrastructure; landscape and visual effects; safety and security; socioeconomics, recreation and tourism; and the water environment. This document is the Applicant's response to that letter.

1. Draft Development Consent Order

Reference	Question	Applicant's Response
1.1	**Requirement 11: Biodiversity Net Gain** At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) **[REP6-030]**. In Schedule 3 of **[REP6-030]** a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend.	*Not addressed to Applicant*
1.2	**Requirement 11: Biodiversity Net Gain** The ExA notes that in the revised draft DCO **[REP6-030]**, as it is currently written, requirement 11(1), (2) and (3) only state that interim and final biodiversity net gain assessments, and the biodiversity offsetting scheme (if required), must be submitted to each relevant planning authority. Notwithstanding, article 55(1) of the draft DCO, there is no wording within the current requirement 11 that states that written approval of each relevant planning authority is required and that the assessment/ scheme shall thereafter be implemented as approved. The applicant is requested to provide amended wording to either reflect this in the next version of the	The Applicant notes the ExA's comments regarding Requirement 11, but does not consider that it is necessary or appropriate to amend the draft DCO to require approval by each relevant planning authority of the Interim Biodiversity Net Gain Assessment, Final Biodiversity Net Gain Assessment or Biodiversity Offsetting Scheme. By way of context, the Applicant's commitment to deliver a minimum of 10% biodiversity net gain (BNG), is being provided on a voluntary basis. There is currently no statutory requirement for nationally significant infrastructure projects to secure 10% BNG. The proposed provisions therefore represent an additional environmental commitment offered by the Applicant and the Applicant considers that the introduction of a multi-authority approval mechanism would be disproportionate. The purpose of Requirement 11 is to secure the delivery and reporting of BNG. The Interim BNG Assessment and Final BNG Assessment will be prepared in accordance with the methodology and metric set out in the

Reference	Question	Applicant's Response
	draft DCO, or justify its proposed wording in this regard.	Biodiversity Net Gain Report **[APP-299]** and will demonstrate whether the committed level of BNG has been achieved. The Applicant considers that requiring approval by each relevant planning authority would be unnecessary and impractical. The Project is assessed using a single biodiversity metric across the Order Limits as a whole and is not assessed by reference to individual local planning authority administrative areas. As currently drafted, Requirement 11 secures submission of the assessments to all relevant planning authorities. If an approval mechanism were introduced, the practical effect would be that all relevant planning authorities would be required to approve assessments relating to a project-wide metric, notwithstanding that the assessment is not capable of being disaggregated by local planning authority area. This would create unnecessary uncertainty, as different planning authorities could reach different conclusions on the same assessment or Biodiversity Offsetting Scheme, leading to inconsistent requirements, conflicting requests for amendments or delays in implementation. The Applicant therefore considers that submission of the relevant documents to the planning authorities, together with enforceable obligations securing delivery of the committed BNG outcome, provides a more proportionate and effective approach. The same considerations apply to any Biodiversity Offsetting Scheme. The Applicant intends, where possible, to secure legacy biodiversity benefits within the counties affected by the Project. The biodiversity metric applies spatial multipliers to off-site habitat creation, such that sites located further from the impact area generate fewer biodiversity units. The Applicant therefore already has a strong incentive to secure offsetting sites as close as reasonably practicable to the Project and, where possible, within the affected counties. However, the availability of suitable offsetting opportunities will ultimately depend on market availability and the identification of appropriate third-party sites capable of delivering the biodiversity units necessary to achieve the committed BNG outcome. Suitable sites may be located partly or wholly outside the administrative area of a particular local planning authority and will be secured through separate contractual and legal

Reference	Question	Applicant’s Response
		mechanisms with third-party landowners. In those circumstances, it would not be appropriate for a local planning authority to exercise an approval function. Furthermore, requiring approval by each relevant planning authority, whether in relation to site selection criteria or individual sites, could unnecessarily constrain the opportunities available to the Applicant and reduce its ability to secure the biodiversity units necessary to achieve the committed BNG outcome within the required timeframe. The Applicant has already stated the nature of the site selection criteria to be considered within **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant will provide relevant planning authorities with information regarding any off-site BNG sites secured to meet the commitment, but does not consider a formal approval mechanism is required to achieve the purpose of the Requirement. Notwithstanding the above, the Applicant has amended Requirement 11 at Deadline 7 to strengthen the delivery obligations. The revised drafting requires any Biodiversity Offsetting Scheme to be implemented within 18 months of the end of the Construction Period and secures delivery of BNG in accordance with that scheme. The revised drafting therefore secures both the preparation and implementation of any necessary offsetting measures. The Applicant considers that the combination of: (i) submission of the Interim BNG Assessment, Final BNG Assessment and any Biodiversity Offsetting Scheme to the relevant planning authorities; (ii) the obligation to implement any Biodiversity Offsetting Scheme in accordance with the submitted scheme and within the specified timeframe; and (iii) the availability of enforcement powers in the event of non-compliance with the DCO, provides an appropriate, proportionate and enforceable mechanism. Accordingly, no further amendment to Requirement 11 is considered necessary. The Applicant has also confirmed that the Ecology and Landscape Working Group will be kept informed and updated in relation to progress in securing off-site BNG sites and will be able to provide feedback through that forum. This provides an appropriate mechanism for ongoing engagement without the need for a formal approval function.

Reference	Question	Applicant's Response
1.3	**Validation checklists for discharge of requirement submissions/ requirement 15 of Schedule 3 (Employment and Skills Plan)** The ExA draws the attention of all relevant local authorities to the applicant's response to questions 1c and 2b of **[REP6-132]**. Question 1c relates to the possible use of development validation checklists for the discharge of requirement submissions. The applicant previously responded on this matter in **[REP4-303]**, acknowledging such check lists could be helpful, noted it would be appropriate for drafting to be proposed by the host authorities for its consideration. The applicant advises "No drafting has yet been proposed however the applicant will continue discussions on this matter with the host authorities as it progresses ways of working for the discharge of requirements." All local authorities are asked to signpost where such drafting has been previously provided in examinations submissions or to enter such drafting into the examination. Question 2b concerned the Employment and Skills Plan (ESP) and whether requirement 15 of schedule 3 of the draft DCO should be worded to require the document submitted pursuant to that requirement to be approved by the relevant discharging authorities. In the light of the applicant's comments on this matter, as set out in **[REP6-132]**, the ExA seeks the views of all relevant local authorities on	*Not addressed to Applicant*

Reference	Question	Applicant’s Response
	this matter, especially in relation to the tests of necessity, relevance to planning, relevance to the development sought, enforceability, precision and reasonableness in all other respects.	
1.4	**Outline Code of Construction Practice Appendix E (Community Engagement and Public Information) and Appendix F (Outline Noise and Vibration Management)** The applicant responded to ExQ2 questions DCO 2.S3 and DCO 2.S6 in **[REP6-115]**. Revisions were made to the 'Outline Code of Construction Practise Appendix E - Community Engagement and Public Information' **[REP6-078]** and the 'Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management' **[REP6-080]**. The ExA seeks a response from all local authorities who responded to ExQ2 **[PD-023]** DCO 2.S3 and DCO 2.S6, regarding the adequacy of the revisions submitted, bearing in mind their previous responses to ExQ2 submitted at deadline 5.	*Not addressed to Applicant*
1.5	**Outline Landscape and Ecological Management Plan and ecological working group** In its response to ExQ2 DCO 2.S5, Suffolk Wildlife Trust advised it was happy to support the wording, including in relation to the wording of a requirement, for an ecological working group, as proposed and	The Applicant has answered 1.5 b) in advance of 1.5 a) as it was of the opinion that this would assist the ExA. B) The Applicant has agreed for the Ecology Working Group to be called the Ecology and Landscape Working Group (ELWG) and expanded to include consideration of landscape in addition to ecological matters.

Reference	Question	Applicant's Response
	submitted by Suffolk CC **[REP5-270]**. The applicant has amended the outline Landscape and Ecological Management Plan (LEMP) **[REP6-084]** to confirm the remit of the ecological working group broadly aligns with the text suggested by Suffolk Wildlife Trust **[REP1-278]**. The establishment of such a working group is supported by Essex CC (**[REP5-241]**, **[REP5-243]**), who also request the expansion of the scope of the group to include landscape matters, which is reflected in the outline LEMP **[REP6-084]**. To the applicant: a) Explain why you have chosen to amend the text to broadly align with the text suggested by Suffolk Wildlife Trust in its deadline 1 submission and not amended the outline LEMP to reflect the more up to date position where Suffolk Wildlife Trust had agreed to support the wording submitted and proposed by Suffolk CC (**[REP5-270]** Appendix A (entitled LEWG Requirement)) concerning an ecological working group (which may include landscape considerations). b) Explain why you consider in your response to Essex CC **[REP6-114]** the remit of such a working group should be constrained to ecological matters only and justify why the draft DCO requirement has not been included with reference to both landscape and ecology matters.	Section 11.2 in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** has been updated at Deadline 7 to reflect this. The Applicant does not consider that a separate requirement relating to the establishment of an ELWG to be necessary. The purpose, attendees and operation of the ELWG have already been secured through **7.4 Outline Landscape and Ecological Management Plan [Revision G]**. Requirement 4 of **3.1 Draft DCO [Revision G]** requires the Final Landscape and Ecological Management Plan to be substantially in accordance with the Outline Landscape and Ecological Management Plan, and to be submitted to and approved by the relevant Local Planning Authorities prior to commencement of that stage. As such, the commitments set out in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** regarding the establishment and operation of the Ecology and Landscape Working Group must be carried forward into the final version of the document. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** already provides clear commitments that: • an ELWG will be established following the grant of development consent; • the ELWG will include relevant ecological stakeholders, including representatives from Local Planning Authorities, Wildlife Trust(s) and Natural England (where requested and agreed); • the remit, terms of reference, membership, attendance arrangements, meeting frequency and reporting arrangements will be agreed and set out within the final LEMP; and • the ELWG will provide an ongoing forum for engagement on biodiversity and landscape mitigation and enhancement measures secured through the DCO. These commitments are appropriately secured through the management plan process with the detailed arrangements for the ELWG being finalised post-consent. The Applicant considers that imposing an additional requirement would duplicate the controls already provided by Requirement

Reference	Question	Applicant's Response
	To Suffolk Wildlife Trust, Suffolk CC and Essex CC: c) Advise whether you are satisfied in regard to the applicant's wording, as set out in the applicant's outline LEMP **[REP6-084]**, which it advises broadly aligns with Suffolk Wildlife Trust's suggested text, as contained in its deadline 1 submission **[REP1-278]** at paragraph 2.3. d) Provide examples of the types of landscape matters that you consider should fall within the remit of this working group.	4 and **7.4 Outline Landscape and Ecological Management Plan [Revision G].** A) The Applicant does not consider a requirement to secure the ELWG is necessary for the reasons set out in response to B). The establishment of a ELWG is already secured through **7.4 Outline Landscape and Ecological Management Plan [Revision G**] and the Final Landscape and Ecological Management Plan approval process as outlined above. The addition of a requirement would be an unnecessary duplication and could cause confusion. The Applicant reviewed the wording of the requirement and considered this to unnecessary and overly prescriptive. The proposed drafting would embed detailed operational arrangements of the ELWG within the DCO. The details of how such a group should operate may be required to evolve and flex over time given the group is overseeing both ecology and landscape matters and therefore fixing arrangements in the DCO could mean the group is unnecessarily constrained in the future. The suggested wording of the requirement also changes the ELWG from being an advisory group to a body with decision making powers, for example to 'agree reasonable actions that the undertaker must implement'. This would provide the group with powers to direct actions to be taken by the Applicant with no defined voting procedure, dispute resolution mechanism, no direct relationship with the approval role of the Local Planning Authorities and no mechanism for independent review. This is not considered appropriate for an advisory group. In addition, the wording of the suggested requirement creates a long-term obligation, requiring the group to continue until the authorised development is decommissioned, unless otherwise agreed by the group. This is excessive, the Applicant would not be able to cease the group even if it had stopped serving a useful purpose. Finally, the Applicant is also concerned that the wording of the requirement would duplicate enforcement mechanisms. As stated in response to B), the Applicant has agreed to provide an ELWG and took on board the original comments provided by Suffolk Wildlife Trust

Reference	Question	Applicant's Response
		but does not support the imposition of a requirement or the suggested wording by Suffolk County Council. The Applicant considers the approval mechanism for the Final Landscape and Ecological Management Plan provides the appropriate opportunity to finalise the detailed arrangements for the ELWG at the post-consent stage.
1.6	**Protective Provisions (1)** The ExA notes a number of Protective Provisions (PP), including some PPs already incorporated into the draft DCO, have not been finally agreed with the interested party (IP)/ statutory undertaker (SU) to which they relate. The ExA understands currently some 16 bespoke PPs are to be included, with the applicant also negotiating in regard to number of side/ other agreements. In the absence of confirmation from relevant IPs, including SUs, in regard to: i) withdrawal of outstanding objections; ii) agreeing finalised PPs; and/ or iii) reaching agreement with regard to any side/ other agreements required, the ExA is concerned about the status of PPs and any side/ other agreements. In the absence of finally agreed PPs and/ or any necessary side/ other agreements being satisfactorily concluded, the ExA is concerned it will not have adequate information required to make a firm recommendation regarding the matter of PPs and/ or any related side/ other agreements, in its recommendation to the	An update as to the status of negotiations with the Statutory Undertakers and other IP's with whom Protective Provisions are being negotiated is provided within the 8.7 Statutory Undertaker Tracker **[Revision F]** submitted at Deadline 7. The front end of the Tracker records in respect of each SU/IP whether the Protective Provisions are agreed or not agreed and the Deadline at which they were included in the Order. In relation to all Protective Provisions which are not yet agreed the Applicant has added at Schedule to the 8.7 Statutory Undertaker Tracker **[Revision F]** with a table for each party with whom the Protective Provisions are not fully agreed. This sets out the issue remaining between the parties, the wording proposed by the Applicant (which is included within the Order), the wording proposed by the SU/IP and the Applicants reasoning as to why their wording should prevail. This will assist the ExA in determining the final wording of the Protective Provisions to be included in Schedule 16. The Applicant is continuing negotiation with all SU's/IP's and seeking to narrow ground and/or resolve objections and anticipates that some of the objections from SU's/IP's will be resolved by D8 and their objections correspondingly withdrawn. The Applicant will provide both an update to the overall position in relation to negotiation with SU's/IP's at Deadline 8, along with an updated 8.7 Statutory Undertaker Tracker **[Revision F]** including the updated appendix, showing any outstanding drafting differences between the parties in respect of the Protective Provisions remaining at that date. To address the issue of the serious detriment test in section 127 and the statutory tests in section 138, the Applicant submitted 3 section 127/138 submissions at Deadline 6. The Applicant will be submitting the vast majority of the remaining section 127/138 submissions at Deadline 7. In

Reference	Question	Applicant's Response
	secretary of state. This is especially important in regard to SUs in regard to the matter of serious detriment to a SUs undertaking. In the light of the above concern, the ExA would urge the applicant to resolve outstanding matters related to PPs and/ or any side/ other agreements as a matter of urgency. The ExA would also remind the applicant that it will be unable to consider any matters resolved after the close of the examination in its recommendation. This would include any agreement as to PPs, side agreement, interface agreement or other relevant agreements received after the close of the examination.	respect of Anglian Water, where it is hoped that their objection will be withdrawn, a section 127/138 submission will be made at Deadline 8 if necessary where their objection has not been withdrawn by that stage. As all legal agreements are confidential the Applicant would not ordinarily submit these into the examination but notes that ExA's reminder that unless objections are withdrawn before the close of the examination that this information will not be available to the ExA. The Applicant will provide an update as to those matters which it has been possible to conclude with SU's and IP's at Deadline 8.
1.7	**Protective Provisions (2)** A number of preferred PPs having been submitted into the examination. If you have not submitted a preferred PP into the examination, the listed interested parties are asked to do so. If you have already submitted your preferred PP into the examination, please signpost the reference where it can be located in the Examination Library.	*Not addressed to Applicant*

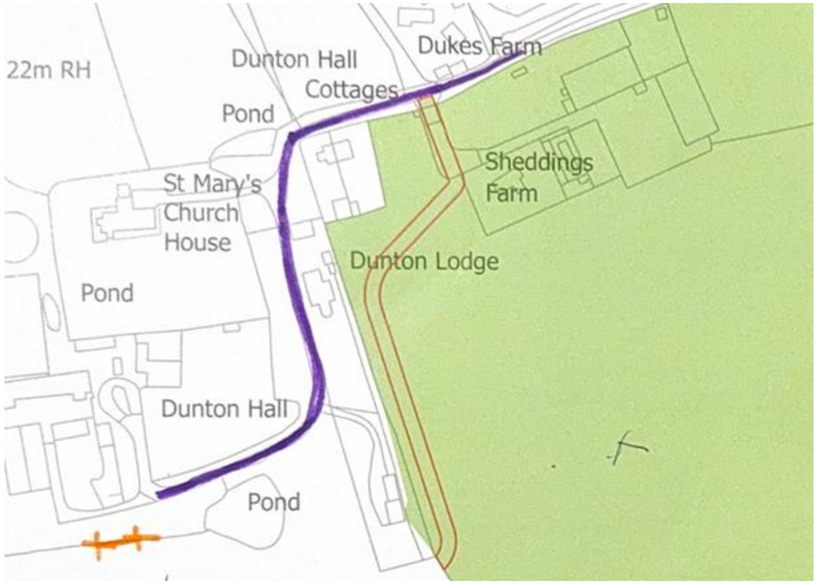
2. Compulsory acquisition and temporary possession of land and rights

Reference	Question	Applicant's Response
2.1	**Affected Persons** Respond to the specific matters raised in the following deadline 6 submissions and update the ExA on your intended actions to resolve outstanding issues: a) ARU Writtle **[REP6-134]** b) Cullum Agri Ltd **[REP6-191]** c) TA Cullum Contracting **[REP6-236]** d) D N Grady and Sons Ltd **[REP6-192]** e) Kathleen Lee **[REP6-214]** f) Conrad Energy **[REP6-146]**	The Applicant has responded to 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 Appendix F of this document. Whilst the Applicant defers to the above document for its detailed responses to the submissions, a high-level summary of the intended actions to be taken by the Applicant in respect of each Affected Party listed is provided below: a) ARU Writtle: as set out in its detailed response in document 8.4.16, the Applicant has demonstrated its efforts to engage positively with ARU Writtle on key concerns relating to Plot 8/42 and microshocks. However the Applicant is not in a position to agree to the latest requests made at Deadline 6 and has provided a detailed justification for this position. There are subsequently no proposed further intended actions to resolve the outstanding matters arising from the Deadline 6 submission, which remain points of difference between the parties. Please refer to the full Applicant response for further detail on this position. b) and c) Cullum Agri / TA Cullum Contracting: as set out in document 8.4.16, the Applicant does not agree with the Affected Party on some matters, relating to proposed land take, pylon siting or construction arrangements. It is therefore acknowledged by the Applicant that some matters are likely to remain outstanding with the Affected Party. Notwithstanding this, the Applicant will continue

Reference	Question	Applicant's Response
		to engage with the Landowner regarding detailed accommodation, access, soils, drainage and reinstatement matters and with UKPN d) DN Grady and Sons Ltd: as set out in document 8.4.16, the Applicant does not agree with the Affected Party on some matters, relating to proposed land take, pylon siting or construction arrangements. It is therefore acknowledged by the Applicant that some matters are likely to remain outstanding with the Affected Party. Notwithstanding this, the Applicant will continue to engage with the Landowner regarding detailed accommodation, access, soils, drainage and reinstatement matters as the Project progresses. e) Kathleen Lee: as set out in document 8.4.16, the Applicant does not agree with the Affected Party on some matters, such as the justification of the compulsory acquisition powers being sought, and therefore it is acknowledged by the Applicant that some matters are likely to remain outstanding with the Affected Party. Notwithstanding this, the Applicant is continuing to engage with the Affected Party and UKPN. f) Conrad Energy: the Applicant is continuing to engage with Conrad Energy on a variety of matters as summarised in 8.4.16. It is acknowledged that resolution of matters relating to detailed design are unlikely to be resolved prior to close of Examination and that therefore some matters between Conrad Energy and the Applicant may remain outstanding. This is reflected in the signed **8.3.19 Signed Statement of Common Ground - Conrad Energy** submitted at Deadline 7. The Applicant has therefore addressed this AP within their s.127/138 submission at Deadline 7 [8.29.3 Application under Section 127 Planning Act 2008 - Conrad Energy]. Ltd
2.2	**Crown Land (1)** In **[REP6-046]** the applicant notes "Applicant received email 04/06/26 confirming 'The MOD Land Management Services (LMS), on the	The Applicant can confirm that the statement quoted in **[REP6-046]** accurately reflects the position communicated by the Ministry of Defence Land Management Services ("MOD LMS"). On 4 June 2026, MOD LMS confirmed to the Applicant that, based on the information available at that

Reference	Question	Applicant's Response
	information provided by the DCO to date, is content to confirm that there are currently no land impacts on the MOD landed estate. However, LMS reserves its position should the DCO route or design change in the future'. 26/06/26 The Applicant issued draft consent wording to the MOD, with the request that the MOD submit this to the ExA at Deadline 6." No such confirmation has been received at deadline 6 from the Ministry of Defence (MOD). To MOD-LMS: Please confirm the above quote is your understanding and provide the consent wording in relation to crown land. To the applicant: Provide the email exchange to confirm the comment.	time, it considered that there were no impacts on the MOD landed estate arising from the Proposed Development, whilst reserving its position should the route or design subsequently change. The Applicant subsequently issued draft Crown consent wording to MOD LMS on 26 June 2026 for submission to the Examining Authority. Following Deadline 6, MOD LMS provided written confirmation of its consent pursuant to section 135(2) of the Planning Act 2008. In that correspondence, MOD LMS confirmed that it is a Crown authority with the benefit of rights over certain plots within the Order Limits, confirmed that the draft Development Consent Order does not authorise compulsory acquisition of MOD LMS interests, and provided its consent under section 135(2) of the Planning Act 2008 to the inclusion of those provisions of the draft Order which apply to Crown land or Crown rights, including Article 42 (Crown rights). In response to the Examining Authority's request, the Applicant has provided the relevant MOD LMS consent email dated 15 July 2026 as requested in Appendix A.
2.3	**Crown Land (2)** In **[REP6-046]** the applicant notes that progress is being made to the transfer of the crown estate (Escheat/Bona Vacantia) interaction land. This has not been executed as yet. Confirm the latest position on the transfer and if complete identify the resultant effect on documents – removal from crown land book of reference and crown land plans and whether this becomes Class 8 white land as it is then in the applicant's control. Furthermore, in the event the transfer is not complete by the close of the examination outline the applicant's position.	The Applicant can confirm that the transfer of the Crown Estate (Escheat/Bona Vacantia) land referred to in **[REP6-046]** has now completed. The land transfer was completed on 13 July 2026 pursuant to a transfer from the Solicitor for the Affairs of His Majesty's Treasury to National Grid Electricity Transmission Plc. The land in question comprises plots B-16/41, B-16/42, B-16/43 and B-16/44. These plots were previously identified as Crown land owing to the Crown's Bona Vacantia interest. Following completion of the transfer, National Grid Electricity Transmission Plc is now the owner of the freehold interest. As a consequence, the Applicant is reviewing the land referencing documents to determine the appropriate amendments required. Pending final checks to confirm, the Applicant's position is that, following completion of the transfer, these plots are no longer Crown Land and therefore no longer require inclusion within the Crown Land Plans or the Crown Land sections of the Book of Reference. The Applicant will submit

Reference	Question	Applicant's Response
		any necessary factual updates to the relevant land referencing documents at Deadline 8.
2.4	**Sec 127/138 applications** The applicant has submitted applications under sections 127/138 in respect of the following SUs. The ExA requests responses from the named SUs in respect of those submissions: a) Affinity Water Ltd **[REP6-129]** b) Network Rail Infrastructure Ltd **[REP6-130]**, c) Northumbrian Water Ltd **[REP6-131]**	*Not addressed to Applicant*
2.5	**Karl Owen [REP6-213]** Respond to the issues raised and update the ExA on progress and how and if the applicant proposes to resolve the issues raised.	The Applicant has responded to 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 moving forward, the Applicant will continue to engage directly with Mr Owen and his family about his private requests. The Applicant is seeking to arrange a further meeting directly with Mr Owen.
2.6	**Clare Lanham and Dick Lanham** At page 22 of **[REP6-114]** reference is made to alternative access arrangements via third party land to address the Lanham's issues. Update the ExA on the latest position, including whether this land is within the application site boundary, how access would be secured and any potential timescale for reaching agreement.	The Applicant confirms that the alternative route proposed by the AP to avoid their home/farm entrance is not on the AP's land and lies outside of the Project Order Limits. Two additional landowners would be required to agree to this route (one of which is the AP's landlord of a rented field). Therefore, any revised access would: • Need a separate agreement with two additional landowners • Require planning consent outside of the DCO • Require agreement by voluntary negotiation (no CA powers) • Cannot be allocated a timeline given this necessitates a private treaty deal dependent on two third parties • Transfer effects A plan showing the proposed new access route is illustrated in purple below.

Reference	Question	Applicant's Response
		 Proposed new access shown in purple Fisher German has approached both landowners and their respective agents to explore this option but have yet to receive a response from either, although one was receptive to tentative discussions in February 2026. The Applicant notes the IP's concerns regarding the interaction between the proposed permanent access route and the property and has committed to keeping this under review as set out in the Additional Detailed Design Requests, at ADDR-91 at Appendix F of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**.

Reference	Question	Applicant's Response
2.7	**Compulsory acquisition of operational highway** Notwithstanding your reply to question 1.7 above, please confirm if the applicants submitted PPs, (or other mechanisms secured in the draft DCO) ensure that if compulsory acquisition powers are approved the highway authority will be able to ensure operation of the public highway.	*Not addressed to Applicant*

3. Biodiversity, ecology and the natural environment

Reference	Question	Applicant’s Response
3.1	**Assessment of impacts on bat species and proposed mitigation** In paragraphs 6.1.11 to 6.1.14 of the revised version of the outline LEMP **[REP6-084]**, the applicant has included further details of mitigation measures for bat species. To the applicant: For the sake of consistency clarify whether the references made within **[REP6-084]** to "preliminary roost features" are the same as the "potential roost features" references that are stated in the Bat Roost Report **[AS-034]** and amend accordingly. Furthermore, confirm that all trees that have currently been classified "further assessment required" as per **[AS-034]** would be assessed in order to determine the presence or absence of potential roost features. Also, justify why the use of a 10% figure for bat boxes and/ or tree veterinisation for trees with potential roost features that you have cited in paragraph 6.1.12 of **[REP6-084]** would provide an adequate level of mitigation. To all local authorities and Natural England: Comment on whether the amendments made to the revised outline LEMP **[REP6-084]** now satisfy your concerns in relation to the assessment of impacts on bats and proposed mitigation. This should include whether you	The ‘preliminary roost features’ identified in the **7.4 Outline Landscape and Ecological Management Plan [REP6-084]** are the same as the ‘potential roost features’ (PRF) referenced in the **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [Revision C]**. The text in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** has been amended as requested for consistency. The Applicant confirms that all impacted trees, including those identified as ‘further assessment required’, will be subject to further bat surveys to confirm the presence or absence of potential roost features. Those trees with features classified as PRF-M will be subject to further bat surveys to confirm the presence or absence of roosting bats, as agreed with Natural England please see paragraph 6.1.4 to 6.1.8 in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** for further details. Replacement planting of trees will be undertaken on completion of works, with the Project committing to deliver 10% Biodiversity Net Gain for all area habitats and linear habitats (including woodlands and tree bands) and a 3:1 compensation ratio for all individual trees lost. This replacement planting strategy will ensure there will be no loss of features suitable for use by roosting bats in the long-term. The surveys undertaken also revealed an abundance of trees with suitability to support roosting bats in the wider landscape, that would not be affected by the Project. It was on this basis that replacements for PRF’s were not originally proposed by the Applicant. Replacements boxes/veteranisation were only to be provided for confirmed bat roosts as required by Natural England through the licensing process. However, it has subsequently been agreed with the local planning authority ecologists that replacement of potential roost features in the form of bat boxes and veteranisation of existing trees are to be provided as

Reference	Question	Applicant's Response
	think the 10% figure, as proposed in paragraph 6.1.12, would be sufficient. If you have any remaining concerns then please set these out, including what specific actions you consider should be undertaken by the applicant to resolve your concerns.	mitigation/enhancement for the short to medium-term loss of PRF's. This is additional to any boxes or veteranisation that is required as part of a licence for impacts to confirmed bat roosts which will be agreed with Natural England. That Applicant has included within the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** a provision of bat boxes and/or veteranisation of retained trees, equating to 10% of the number of trees to be removed, as a result of the Project, with bat potential features (i.e. either PRF-I or PRF-M). The 10% was agreed with the majority of local planning authorities across the route as shown in the relevant Statement of Common Grounds submitted at Deadline 7, with South Norfolk as the exception who are requesting 30%. While there is no guidance available to inform what an appropriate number of bat boxes is for short-medium term loss of potential bat roosting features where no roosts have been identified, 10% was agreed as sufficient given the linear nature of the scheme, the replacement planting strategy proving mitigation in the long-term and the expanse of existing alternative potential features in the wider landscape. It argued that it is more important that the bat boxes are sited in the right locations across the route, than just having an increase in quantum of bat boxes installed. The Applicant maintains its position that 10% is an appropriate and proportionate mitigation approach for loss of features that don't (and may never) support a confirmed bat roost.

4. Historic environment

Reference	Question	Applicant's Response
4.1	**Bush Hall non-designated heritage asset (NDHA)** The Code of Construction Practice **[REP6-072]** contains new proposed restrictions to ensure that proposed pylons RG68 and RG87 do not move to the south or east respectively to prevent physical impact to Bush Hall. Please confirm if this allays your concerns relating to this NDHA.	*Not addressed to Applicant*
4.2	**Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation** At deadline 5 the applicant submitted a revised version of the outline Archaeological Mitigation Strategy (AMS) and outline Written Scheme of Investigation (WSI) **[REP5-161]**. Essex CC **[REP6-147]** (also included in **[REP6-170]** from Thurrock Council) and Suffolk CC **[REP6-165]** have responded and raised concerns about elements of the wording and matters that they consider have been omitted. It would appear to the ExA that both Essex CC and Suffolk CC have expressed doubt that the outline AMS and outline WSI, in its current form, would be suitable as a control document to inform future archaeological evaluation and mitigation. Matters and/ or specific wording still not agreed	The Applicant has engaged directly with the archaeological advisor for Essex County Council (and Thurrock Council) to agree the updates in relation to the matters they raised. These updates were confirmed to be agreed on 14 July 2026 and are included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7. The applicant has also carefully considered the comments provided by Suffolk County Council at Deadline 6 in the updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**. If an update has not been made the reason for this is provided in Appendix G - Suffolk County Council Submission of **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6**. The applicant does not consider that any major areas of disagreement remain and therefore there is no barrier to discharge of Requirement 5 of **3.1 Draft DCO [Revision G]**. Regarding any future disagreement on DWSIs, in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** the Applicant included a process for dispute

Reference	Question	Applicant’s Response
	include those relating to geoarchaeology, trial trenching proposals and proposed mitigation. As stated in requirement 5 of the draft DCO **[REP6-030]** no stage of the authorised development may commence until a detailed WSI has been submitted to and approved by the relevant planning authority. Consequently, the applicant is requested to respond to the concerns raised by these authorities and submit at deadline 7 a further version of the outline AMS and outline WSI that seeks to address the matters raised by Essex CC and Suffolk CC. This further version can be submitted on a 'without prejudice' basis, either in full or in part, with the appropriate elements marked accordingly. For any comments from Essex CC and Suffolk CC that the applicant is not proposing to take on board in a revised outline AMS and outline WSI, the applicant is requested to justify its position and explain why it considers requirement 5 of the draft DCO would still be capable of being 'discharged' in order to allow works to commence. The applicant is also requested to explain what it considers the process would be if the applicant and the discharging authorities could not reach full agreement on the contents of any future detailed WSIs.	resolution for the progress, strategy or completion of work, in Section 5.2. The Applicant has since considered the concerns raised by Suffolk County Council and has removed this text. Disagreement (if any) as to the content of any future DWSIs, is capable of resolution by way of the existing mechanism for appeals under article 55 (procedure regarding certain approvals etc.) and Schedule 4 (discharge of requirements) of the **3.1 Draft DCO [Revision G]**.

5. Land use and soils, green infrastructure

Reference	Question	Applicant's Response
5.1	**Green Infrastructure** At [REP6-147] paragraphs 1.6 and 1.12-1.20 Essex CC refers to the Local Nature Recovery Strategy (LNRS) and how it has been fully integrated in the identification of mitigation to ensure multifunctional environmental outcomes. Can the applicant explain how it has fully embedded and aligned its compensation, enhancement and mitigation strategies to accord with the LNRS and how this addresses green infrastructure requirements as a cross-cutting matter along the length of the proposed development, given that this is an issue wider than just in Essex.	The Applicant has provided a response to this question in Appendix A of this document.

6. Landscape and visual

Reference	Question	Applicant's Response
6.1	**Residential Visual Amenity Assessment (RVAA)** A number of IPs raise concern over the accuracy of the information contained within the RVAA. Respond to such concerns, specifically, representations over the accuracy of measurements used in the RVAA, the accuracy of RVAA visualisations (the ExA notes in this respect that the visualisations are not verified views as data has not been collected in person), and representations over the 200m distance as taken from properties' curtilages **[REP6-212]**, [**REP6-218] [REP6-203]**, **[REP6-212]**, **[REP6-229]**	The Applicant's response to the comments raised by the Interested Party in **[REP6-212]** regarding the accuracy of measurements within the RVAA is set out in document **'8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6' submitted at Deadline 7'**. This sets out our justifications for measurements upon, for example, distances from the Interested Party's property to the nearby public right of way and distances from the property to proposed pylon positions (including the 'worst-case scenario' positions within the LoD). Consequently, we do not recognise the claimed inaccuracies of our assessment expressed in the Interested Party's submission. The Applicant's response to the comments raised by the Interested Party in **[REP6-218]** regarding the accuracy of measurements within the RVAA is set out in document '8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6' submitted at Deadline 7. This sets out our justifications for measurements contained within Section 3 and Appendix A of document **8.26 Response to Rule 17 Letter received 5th June 2026 [Rep5A-003]**. The Applicant's response to the comments raised by the Interested Party in **[REP6-218]** regarding the accuracy of visualisations within the RVAA is set out in document '**8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6'** submitted at Deadline 7. This reiterates that in the introductory text in Section 1 of document **8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 – Part 1 [REP5-205], Part 2 [REP5-206], Part 3 [REP5-207]** and **Part 4 [REP5-208]**, and in the notes upon each of the visualisations, that the prepared images are indicative only. Paragraph 1.1.5 in this document also sets out the limitations of the visualisations in respect of the datasets used to record the location, form and height of

Reference	Question	Applicant's Response
		trees and hedgerows. On the basis of the above explanations, we do not recognise the claimed errors and/or inaccuracies of our assessment expressed in the Interested Party's submission. In light of the question raised by Interested Parties in **[REP6-203]** and **[REP6-229]** upon the distances provided in the 3rd column of Table A13.4.2 and the 4th column of Table A13.4.3 **within Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Final Issue C [REP5-126]** (the RVAA), the Applicant has provided an update and an addendum to the RVAA at Deadline 7 (**Document 6.13.1.A4 Environmental Statement Appendix 13.4.1 – Addendum to the Residential Visual Amenity Assessment Final Issue A**). The Applicant maintains that the findings of the Step 2, 3 and 4 assessments within the current RVAA are valid as these have been assessed with awareness of properties' curtilage and the distances these are to the Project. No breach of the Residential Visual Amenity Threshold has been identified to any of the residential properties that have been identified – within the RVAA or its addendum.
6.2	**Masterplans** A number of IPs have made representations at deadline 6 concerning the Masterplans **[REP5-199]**. The ExA acknowledge that these plans have been produced in consultation with local authorities, their draft status, and that such plans are illustrative in nature. The ExA also note the applicant's point of view, as made in ISH4 and restated in **[REP6-118]** that the provisions within the masterplans are not necessary to make the application acceptable in planning terms. To the applicant: a) While accepting the illustrative nature of the plans, some information submitted from IPs could be usefully incorporated within the	a) The veteran and notable trees referenced by Aldham Parish Council in their submission **[REP6-175]** are all located outside of the Project's arboricultural study area, which comprises the Order Limits + 30 m. The two veteran trees identified on the southern constraint plan are not mapped incorrectly, they were identified by the Project within the study area, these do not appear on the ATI web map. In relation to the Council's final point where it is stated '*It appears the area around the B 1508 to the East of Wormingford Airfield has not been surveyed for veteran trees?*', the Applicant has reported on trees to the east of Wormingford airport and identified no veteran trees, this is supported by a review of the ATIs webmap that shows no ancient, veteran or notable trees within (or near to) the arboricultural study area. The constraints plans are provided on an illustrative basis, bringing together multiple key constraints mapped for the Project onto one plan, they do not replace any of the topic specific constraints drawings. It is therefore not necessary to update the constraints plans which reflect the

Reference	Question	Applicant's Response
	masterplans. For instance (but not limited to), Aldham Parish Council **[REP6-175]** identify a number of veteran trees and notable trees from the Woodland Trust Ancient Tree Inventory that do not appear on the constraints plans. Consider whether the plans should be updated and resubmit if necessary. b) The ExA would appreciate further information on the preferred method of the applicant to deal with the matter via an article in the DCO and how this was dealt with in the London Luton DCO (noting the applicant caveat that compensation for residual landscape and visual effects is not required pursuant to the legal and policy framework). To all local authorities: a) Provide your views on the potential mechanism provided by the applicant to provide funding for provision of landscape compensation (as contained in Annex of **[REP6-118]**).	constraints identified by the Project.In relation to other comments made regarding to **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**, the Applicant has responded in **8.4.18 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]**. b) The Applicant has been engaging with the relevant Local Planning Authorities in relation to the wording of the Article and incorporated updated wording within **3.1 Draft DCO [Revision G]** submitted at Deadline 7. The Article is being put forward on a 'blue pencil' basis, i.e. without prejudice to the Applicant's position that the legal and NPS policy framework does not require provision of landscape compensation, offsetting or enhancement. This is a matter for the Secretary of State to determine and the proposed Article in the DCO can be included or excluded by the Secretary of State depending on its determination of this issue if the DCO is granted. The mechanism in the proposed Article is similar to the way in which the financial contribution was committed by the promoter of the London Luton Airport Expansion DCO, which has been detailed below. In terms of the drafting of the Article, the Applicant considers that it has largely reached agreement on the revised wording with Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council between Deadlines 6 and 7. In addition to the general wording of the Article, specific feedback was sought in relation to the geographical extent of the areas that can benefit from the compensation, the amount of funding sought in each location and the criteria utilised to define the scope of the spend. The feedback received was taken into consideration in the updated drafting of the Article and associated plans. **London Luton Airport Expansion Order 2025** The London Luton Airport Expansion relates to various expansion works including the extension and remodelling of Terminal 1 to increase overall passenger capacity to 32 million passengers per annum. The application was submitted by London Luton Airport Limited and granted on 3 April 2025.

Reference	Question	Applicant’s Response
		The Chilterns National Landscape (CNL) is situated approximately 5km to the west of London Luton Airport and 3km to the north at its closest points. Although there is no development within the CNL itself, as this is an airport expansion, there will be a resultant increase in overhead traffic which will have a direct impact on relative tranquillity within the CNL. This and the close proximity of the CNL itself makes the s85/245 duty directly relevant. The ExA considered that the Proposed Development would not conserve and enhance the natural beauty of the Area of Outstanding Natural Beauty (AONB) and would conflict with the aims and objectives within the Chilterns AONB Management Plan. In the absence of specific mitigation measures being put forward by the Applicant to offset those harms, the ExA did not consider that the duty to “seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty” had been met and was unable to recommend to the Secretary of State that this duty had been complied with. For these reasons, the ExA considered that the impacts on the CNL attracted great weight against the making of the Order. In response the Secretary of State explored this matter further during the decision-making period and invite further representations. The Applicant stated that it did not consider that any further mitigation or compensation measures were capable of being brought forward to effectively reduce or offset the residual noise effects from aircraft overflights on amenity and tranquillity in parts of the CNL and did not consider that such further mitigation was necessary in planning terms. The Applicant considered that in relation to noise, the principal mitigation measure for the CNL was already provided for in the Noise Envelope within the Green Controlled Growth Framework and the noise controls in the Air Noise Management Plan. Without prejudice to its primary position that policy compliance would amount to compliance with section 85 of the CRoW Act the Applicant set out that, if the Secretary of State considered it necessary, they could include a new article 54 in the Order and proposed wording which would secure a one-off financial payment of £250,000 to the Chilterns

Reference	Question	Applicant's Response
		Conservation Board to use towards projects that would further the purposes of conserving or enhancing the CNL. The Secretary of State considered that a financial contribution of £250,000 for projects which further the purposes of conserving or enhancing the Chilterns National Landscape is sufficient and necessary to meet section 85 of the CRoW Act. Accordingly, the Secretary of State included Article 54 in the Order: *Article 54 (Enhancement and conservation of the Chilterns National Landscape) of the DCO states:* *54.—(1) Having regard to the duty under section 85 of the Countryside and Rights of Way Act 2000, upon service of the notice referred to in article 44(1), the undertaker will make a funding contribution to the Chilterns Conservation Board in the sum of £250,000.* *(2) The Chilterns Conservation Board is to allocate the funding contribution referred to in paragraph (1) to one or more projects which—* *(a) further the purposes of conserving or enhancing the Chilterns National Landscape; and* *(b) are consistent with the Chilterns AONB Management Plan 2019-2024 (or any superseding or equivalent document).* *(3) Upon any allocation of funding in accordance with paragraph (2), the Chilterns Conservation Board is to notify the undertaker about the project which is in receipt of the funding and provide the undertaker with such information about the project as the undertaker may reasonably request.* *(4) In this article, the "Chilterns Conservation Board" includes any successor body which performs its functions and duties.* There are also other examples where financial contributions have been secured using this mechanism. Article 54 (Conservation and enhancement of protected landscapes) of the Gatwick Airport (Northern Runway Project) Development Consent Order 2025 provides for a financial contribution to be made by the undertaker to support delivery of the management plans for designated national landscapes and the South Downs National Park, having regard to

Reference	Question	Applicant's Response
		the amended duty under section 11A(1A) of the National Parks and Access to the Countryside Act 1949 and section 85(A1) of the Countryside and Rights of Way Act 2000; Article 65 (Financial arrangements for the Kent Downs National Landscape) of the A122 (Lower Thames Crossing) Development Consent Order 2025 requires the undertaker, Natural England, and the Kent Downs National Landscape Unit to agree in writing a financial contribution for the benefit of the Kent Downs National Landscape, having regard to the duty under section 85 of the Countryside and Rights of Way Act 2000, prior to commencement of the authorised development or the tunnel being open for use, whichever is the earlier, with the contribution to be used in accordance with the Kent Downs AONB Management Plan.
6.3	**Good design and lighting controls** The ExA notes the submission of the amended Design and Access Statement (DAS) **[REP6-090]** and Design Approach for Site Specific Infrastructure (DASSI) **[REP6-092]**. a) The DASSI states that the operational lighting at the proposed East Anglian Connection Node (EACN) substation will "have regard" to the Dedham Vale Lighting Design Guide. Should such wording be strengthened, and if not, why not? b) Would similar wording as for (a) be useful for all substations, extensions and sealing end compounds? While not all are within the setting of the National Landscape, the use of dark skies principles for such lighting would seem appropriate in such rural areas. The ExA note in this respect the submissions of Burstall Parish Council at deadline 6 **[REP6-143]** and their existing issues of light pollution.	In response to Part a) the Applicant took the approach to state "have regard" to the Dedham Vale Lighting Design Guide since the guidance would also need to be considered alongside any HSE requirements. It is the Applicant's intention to be in accordance with the Dedham Vale Lighting Design Guide, following the key design principles to align with the required E0 and E1 classifications under ILP GN01 2021, respectively. It should be noted that under normal operational conditions there is no lighting requirements. All National Grid substations are typically unmanned, therefore the use of the substation lighting on substation buildings during the evening or night time is limited to fault response activities by the call out engineers or security call outs when the security team or police respond to a security alarm; in all other circumstances the substation lighting is off. Outside of working hours, it is only infrequent additional task lighting that may be required when undertaking specific maintenance activities. Furthermore, the Dedham Vale Lighting Design Guide aligns with the lighting measures already set out within the **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP6-092]**. Primarily, the Operational Lighting Management Strategy also includes measures for directional lighting and typical lux levels.

Reference	Question	Applicant’s Response
	c) In particular around the EACN and Burstall, how will potential cumulative lighting issues be dealt with given other works potentially happening in their vicinity? d) Pylons East Anglia **[REP6-229]** note that the Cambridge Waste Water Treatment DCO included a requirement for a lighting design strategy. Would such a requirement be appropriate in this case, and if not, why not?	As stated in Commitment GG26 in **7.2 Outline Code of Construction Practice [Revision G]** *‘Construction lighting will be of the lowest luminosity to safely perform each task and include motion sensors or be switched off when not in use where it is safe and efficient to do so. Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task-specific lighting will be directed to reduce intrusion so far as is reasonably practicable, and considered by all necessary specialists’*. The CoCP is secured through Requirement 4 of **3.1 Draft Development Consent Order [Revision G]** and the DASSI is secured as a Certified Document in Schedule 19 of the of **3.1 Draft Development Consent Order [Revision G]**. The Applicant has updated Commitment GG26 in the CoCP following engagement with Suffolk County Council to secure that where the Project is ‘*within and in proximity to Dedham Vale National Landscape, lighting will be designed and operated substantially in accordance with Dedham Vale National Landscape Lighting Design Guide, Guidance to reduce light pollution and protect our dark skies, July 2023.’* The wording in the 7.16 DASSI (Revision E) has also been strengthened to state that the lighting will be designed and operated substantially in accordance with Dedham Vale National Landscape Lighting Design Guide, Guidance to reduce light pollution and protect our dark skies, July 2023. With regards to Part b) and in line with the Applicant’s response to Part a) the operational lighting at the Bramford Extension and Tilbury North Substations will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Subject to adherence with HSE requirements, it is considered that the lighting proposal at all substation sites would be substantially in accordance with specifications set out in the Dedham Vale Lighting Design Guide. It should be noted that **7.16 DASSI (Revision E)** confirms there will be no permanent lighting at the CSE compounds.

Reference	Question	Applicant's Response
		In responding to Part c) as previously mentioned in response to Part a) under normal operational conditions there is no lighting requirement for substation sites. Notwithstanding the normal operating position and in response to any infrequent use, the Applicant has included measures in the DASSI and made commitments in Management Plans controlled under Requirements in the DCO to limit and manage lighting as set out below. The DASSI (Revision) confirms light spillage will be managed by minimising the provision of lighting: keeping to where it is required for tasks, specifying fittings that avoid light spillage, and using controls such that it only comes on when required. This will follow the dark skies strategy: to cut light pollution, its impact on wildlife, prevent wasting electricity, and mitigating visual impact at night. Windows will be fitted with blinds to control light spill if the facility is occupied after dark. During construction, commitment GG26 of the **7.2 outline Code of Construction Practice [Revision G]** states that '*Construction lighting will be of the lowest luminosity to safely perform each task and include motion sensors or be switched off when not in use where it is safe and efficient to do so. Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task-specific lighting will be directed to reduce intrusion so far as is reasonably practicable, and considered by all necessary specialists'.* The mitigation measures set out **within 7.2 Outline Code of Construction Practice [Revision G]** are secured via Requirement 4(a) (Construction Management Plans) **of 3.1 Draft Development Consent Order [Revision G]**. The above approach is considered to be in accordance with measures proposed by other energy developers around the Bramford and EACN substations. As noted in the Applicant's response to DES 1.9 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant has considered lighting during construction. No assessment of operational

Reference	Question	Applicant's Response
		lighting on visual receptors was undertaken due to the limited potential for significant effects. Should there be an issue with light spill during construction, members of the local community will be able to contact a free project hotline as detailed in Document: **7.2 Outline Code of Construction Practice Appendix E Community Engagement and Public Information (Revision D)**. In response to Part d) the Applicant notes the reference to the Lighting Design Strategy submitted by the Cambridge Waste Water Treatment DCO (Planning Inspectorate Reference WW010003). An Operational Lighting Management Strategy was submitted as part of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP6-092]** at Deadline 6. The Applicant's view is that the DASSI represents the most appropriate vehicle through which to take account of the particular matters raised by the Councils and Dedham Vale National Landscape and Stour Valley Partnership. Furthermore, commitment GG26 in 7**.2 Outline Code of Construction Practice [Revision G]** secures the principles of the lighting proposals. The Applicant would reemphasise in this context that compliance with the CoCP, and indeed with all of the Management Plans, is secured through Requirement 4 of the of **3.1 Draft Development Consent Order [Revision G]**. As set out in the Applicants response to DES 1.9 there was consideration as to whether it would be appropriate for operational lighting schemes to be subject to approval through a Development Consent Order Requirement. However, in light of the limited and intermittent nature of operational lighting at substations, the absence of routine night-time lighting during normal operation, and the fact that ecological and landscape effects of lighting have been assessed and mitigated through the application documents, the Applicant does not consider such a Requirement to be necessary to make the development acceptable in planning terms. The Applicant notes a similar request on the Bramford to Twinstead DCO (EN020002) 8.9.3 Applicant's Response to Second Written Questions **[REP7-025]** question DC2.6.21. In the ExA Recommendation Report

Reference	Question	Applicant's Response
		(paragraphs 7.3.277 to 7.3.280), the ExA were satisfied that lighting measures were secured through the CEMP and Requirement 4, and an additional requirement for lighting was not required. The Applicant is seeking a similar approach whereby the details are included within the DASSI (certified document) and the **7.2 Outline Code of Construction Practice [Revision G]** (secured by Requirement 4 of the **3.1 Draft Development Consent Order [Revision G]**), therefore an additional lighting requirement is not necessary.
6.4	**Good design** The ExA notes the design review panel (DRP) proposals contained within the DAS **[REP6-090]** and DASSI **[REP6-092]** and the provisions for local planning authorities, Dedham Vale National Landscape officials, wildlife trust representatives and North Falls and Five Estuaries project representatives to be invited to meetings where relevant. To the applicant: a) How often is the DRP likely to meet and at what stages of the process will the DRP have input into the design? b) Notwithstanding issues of safety regulation and security, what powers or control or influence will the DRP have and how will this be secured? c) The more formal inclusion of the environmental areas around the cable sealing ends for DRP review would seem useful. A similar table to table 6.1 of the DASSI should be provided in this regard to provide more certainty than currently exists within the DASSI. To all local authorities and the Wildlife Trusts:	In response to Part a), the DASSI has been updated at Deadline 7 to clarify that the Design Review Panels (DRP) will be targeted geographically and/or by specific design component, such as substations, link pillars or Environmental Areas. The Applicant's intention is that each Design Review Panel will be tailored to the specific design components under consideration. Where there is synergy between matters for discussion, it may be appropriate to group those design components together. It is anticipated that there could be up to three DRP groupings at each Design Control Point, and this is considered necessary to ensure the number of invited stakeholders on the panel remain manageable and the DRP process is effective. To facilitate meaningful participation and maximise the effectiveness of the design review process, the Applicant will liaise with relevant DRP members and invited stakeholders in advance of each review stage to agree suitable meeting dates, attendance arrangements and any supporting information required to support constructive and informed engagement. Subject to receiving development consent, the **7.16 Design Approach for Site Specific Infrastructure (DASSI) (Revision E)** sets out the stage of the design process when DRP will have input into design. Figure 6.2 and accompanying text states that: '*Using GGP's established design assurance model, DRP Design Reviews are proposed to be timed in accordance with the GGP's Design Control Points (DCPs). Should the Secretary of State be minded to consent the*

<table>
<tr><th>Reference</th><th>Question</th><th>Applicant’s Response</th></tr>
<tr><td></td><td>d) Provide your views on the DRP proposals and any other final comments you wish to make on the subject of good design.</td><td>
scheme, it is proposed that two types of Design Reviews are held and aligned to the DCPs as follows:
<table>
<tr><td>DCP03</td><td>Detailed Design</td><td>The design stage is where the ‘first-in-type’ designs taken from the reference design library are adapted, scaled up and produced for all extents of the project’s limits for full coverage.</td></tr>
<tr><td>DCP04</td><td>Final Design</td><td>The design includes sufficient allow detail allowing for the finalisation of material and equipment and manufacture or production of supply contracts (Tier 2) to be commenced.</td></tr>
</table>
The Design Review Panel will therefore be engaged as part of the detailed design and final design stages.
DCP03: Detailed Design – Standard Design Review – DR1
At DCP03 Detailed Design stage, the first DRP Design Reviews will be undertaken for each location type described in the Design Review Process. This will take the format of a Standard Review, whereby the project team presents the project to the panel, focussed on the Design Principles scope for variation as provided in the DASSI. This will give the Executive Design team the opportunity to make a case for their proposals, engage in discussion and hear the panel’s comments directly.
This review will take the form of a full-day or half-day meeting, depending on the complexity of the design under consideration. Each session will include a presentation on strategic and detailed design matters, panel discussions, and a chair’s summary of comments and recommendations. Where appropriate, the session may also include a site visit.
DCP04 Final Design Review – Validation Design Review – DR2
At DCP04: Final Design there is an opportunity for the DRP to undertake a Validation Design Review. This will be a continuity and compliance check to ensure that recommendations from DCP03 Detailed Design stage have been incorporated, as far as practicable, into the final design, and justification provided by the Design Executive where the DRP recommendations have not been incorporated into the final design. Validation Design Review will be undertaken for each location type described in the Design Review Process.
</td></tr>
</table>

Reference	Question	Applicant's Response
		This review will be undertaken in a workshop setting, during which the project team will present a summary of the changes made in response to the earlier design review and discuss those changes directly with the panel. This review is anticipated to be held as a half day meeting. The session will include a panel discussion and a chair summary of comments and advice including, explanation where recommendations could not be incorporated into the design. Therefore, the Design Review Panel(s) will meet at two separate design stages post-consent to discuss the relevant building(s), link pillars and Environment Areas. **Post examination early in-person workshop** Prior to the commencement of the formal design reviews, the Applicant will hold an introductory workshop following the close of the Examination to provide external participants with further details on the design review process, governance arrangements and review protocols (including terms of reference). This workshop would also incorporate the presentation on link pillars which was discussed at Issue Specific Hearing 4 on the 25th June 2026. In response to Part b), the Design Review Panel will be invited to review and comment on those design matters set out in the Design Principles section of the **7.16 DASSI [Revision E]** submitted at Deadline 7. The role of the DRP is advisory rather than decision-making; however, it will provide independent scrutiny and expert design challenge throughout the detailed design process. Responsibility for design decisions and the selection of preferred design solutions will rest with the Design Executive, who will have regard to the recommendations of the DRP. The Design Executive will give due consideration to feedback arising from the design review process. Where appropriate, the design will be refined in response to that feedback, provided that any changes remain consistent with the approved design principles and are compatible with applicable technical, environmental, operational, engineering and safety requirements. The Design Executive will be required to formally respond to the Design Panel Report, identifying which recommendations have

Reference	Question	Applicant's Response
		been adopted and how they have informed the design. Where recommendations are not adopted, clear justification will be provided, including consideration of engineering, operational, environmental, safety or security requirements. The Development Design Champion will sit on the DRP and provide an independent voice throughout the design process, helping to ensure continuity between the established design principles and the detailed design post-consent. The Delivery and Detailed Design Champion will work closely with the Design Executive to ensure that, wherever reasonably practicable, the findings of the DRP in terms of the advice and recommendations contained within the Design Panel Report are incorporated into the evolving design. In combination, both Design Champions hold an authoritative and influential position in promoting the outputs of the DRP, would be responsible for holding the Executive Team to account during the detailed design review stage and securing adherence to the agreed design principles. The influence of the DRP is secured through both the **7.16 DASSI [Revision E]** and Requirement 12 of the **3.1 Draft DCO [Revision G]**. The DRP is also embedded in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which requires discharge under Requirement 4 (1) (c) of the **3.1 Draft DCO [Revision G]**. Requirement 4(2) requires compliance with the Landscape and Ecology Management Plan approved under 4(1)(c). The Final LEMP submitted for approval under Requirement 4 will include a statement demonstrating: • How regard has been had to the relevant DASSI design principles during the development of the detailed design • How recommendations arising from the Design Review process have been taken into account, where appropriate, in the final details submitted for approval. Together, these provisions require the Applicant to undertake the design review process before submitting details for approval under Requirement 12 and Requirement 4 to the relevant local authority.

Reference	Question	Applicant's Response
		In submitting details in accordance with Requirement 12(5) and (6) the Applicant will include a copy of the Design Panel Report and feedback from the Design Executive setting out how it has had due regard to that feedback. This provides a clear and auditable mechanism demonstrating how DRP recommendations have been considered and embedded within the detailed design process at the discharge of requirement stage. The Applicant has therefore carefully considered the mechanisms to enable design outcomes to be scrutinised, assessed and developed during the post-consent design process and how the DRP will influence and control via secured requirements and commitments made in certified documents. In response to Part c), the DASSI currently outlines at Table 6.3 that the Environment Areas at the CSE Compounds will be a matter which the DRP may provide comments and recommendations on. At Deadline 7 in response to the ExA's request, the Applicant has updated paragraphs 6.2.48 and 6.2.49 of the DASSI to include a specific table (Table 6.2) identifying the CSE Compound Environmental Areas that will be subject to the Design Review Process, thereby providing greater certainty regarding the scope of DRP involvement. **Table 6.4: CSE Compound Locations**

Location	Local Planning Authority
Wenham Grove	Babergh District Council Suffolk County Council
Great Horkesley (EACN side) Great Horkesley (Tilbury side)	Colchester City Council Essex County Council
Fairstead (EACN side and Tilbury Side)	Braintree District Council Essex County Council
Tilbury North (YYJ) (Tilbury North and Warley Side)	Thurrock Council

Reference	Question	Applicant's Response
		The Applicant notes that Part d) is directed to all local authorities and the Wildlife Trusts and looks forward to receiving feedback on the proposed Design Review Panel arrangements.
6.5	**Design scenarios** The ExA notes design scenario B is being taken forward around Flying Trade Group and Crown Quarry east and west of the A12 (table 2.4, **[REP6-122]**). **[APP-130]** details this option. Provide a summary and signpost to the environmental assessment undertaken for design scenario B.	The Project alignment presented on **6.4.F1 ES Figure 4.1 – Proposed Project Design [REP4-109]** was assessed within Section 7 (Residual Effects) of each environmental topic chapter in the Environmental Statement (ES). Sensitivity testing was then undertaken within Section 9 (Sensitivity Testing) of each environmental topic chapter to ensure that the likely significant environmental effects arising from the flexibility represented by each Scenario was assessed. In relation to Scenario 4 (Flying Trade Group and Crown Quarry east and west of the A12), 'Scenario B' is within the Limits of Deviation for the Project and therefore assessed within Section 9 of each environmental topic chapter. Where the assessment of the scenarios, including the Flying Trade Group and Crown Quarry east and west of the A12, results in different effects or a difference in the decription of effects, this is described in Section 9 of each environmental topic chapter.
6.6	**Offsite planting** The outline Offsite Planting Delivery Scheme (OPDS) **[REP6-128]** includes a section on management and maintenance. Separately the outline LEMP [REP6-084] has been updated to include a number of adaptive aftercare measures. a) The outline LEMP refers to the outline OPDS but do the documents need to be more interlinked? b) Do the adaptive aftercare measures within the outline LEMP also need to be included in the outline OPDS? If not, please explain why not.	a) The Applicant considers the Outline Landscape and Ecological Management Plan and Outline Offsite Planting Delivery Scheme are appropriately interlinked. The Outline ODPS sets out the framework for identifying, securing and delivering offsite tree planting, including management and maintenance. The Outline LEMP establishes the overarching principles for onsite landscape and ecological management including a cross reference to the production of an ODPS. It would not be appropriate to interlink these documents further, as the Outline LEMP relates to activities within the Order Limits. It is not normally appropriate for the Outline LEMP or Final LEMP(s) to control activities outside the Order Limits on land where the DCO grants no powers. It is therefore not appropriate for the Outline LEMP and the Outline OPDS to be linked to a greater extent as they are serving different purposes. b) The Applicant does not consider it necessary to replicate the adaptive aftercare measures contained within the Outline LEMP in

Reference	Question	Applicant's Response
		the Outline OPDS. The adaptive aftercare measures have been developed for planting within the Order Limits where the Applicant has control and land rights to maintain the planting in this manner. As the locations for any offsite planting required as a result of the 3:1 commitment have not yet been identified, it would not be appropriate to prescribe the same aftercare measures at this stage. The Outline OPDS includes a commitment to five-year aftercare, whilst allowing appropriate and proportionate aftercare measures to be developed once suitable locations have been identified and secured if planting is directly delivered, or alternative delivery mechanisms are identified.

7. Safety and security (aviation safety)

Reference	Question	Applicant's Response
7.1	**Aerodrome safety** A range of views were received at deadline 6 from aerodromes **[REP6-219]**, **[REP6-220]**, **[REP6-227]**, **[REP6-230]**, some of whom do not fully recognise the evidence provided in ISH4 **[REP6-118]**. To the applicant: a) Respond to such views and provide an update on any further meetings or progression made with the relevant aerodromes. b) Provide any evidence as may be available from the British Gliding Association to support your views regarding effects upon Tibenham airfield. To Raydon Wings: c) Provide evidence relating to commercial opportunities that may be lost in the event that the DCO for the proposed development is made.	**Tibenham Aerodrome** a) **The Norfolk Gliding Club written post-hearing submission [REP6-219]** focuses on matters of public safety, operator responsibilities therein, their position of there being an unacceptable aviation safety risk, responsibilities for mitigation, and the trilateral meeting held with the Applicant and the British Gliding Association (BGA) on 29 June 2026. Addressing each in turn, the Applicant's position is clear that there can be no prospect of the Project creating an unacceptable risk to public safety or human health in relation to aviation (see 7.1a within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Point for Issue Specific Hearing 4 [REP6-118]**). The Applicant understands and agrees operator responsibilities for safeguarding including that an operator is responsible for closing unsafe runways or an unlicensed aerodrome *in extremis* if there is an unacceptable aviation safety risk, ensuring a public safety risk cannot arise. The Club accepts in terms that this is the case and relies on the Air Navigation Order. The Applicant has agreed that the presence of an obstacle in the vicinity of an aerodrome increases aviation risk but does not agree with the Norfolk Gliding Club (NGC) position that, in the case of Tibenham aerodrome, the presence of the Project creates an unacceptable aviation safety risk. The Applicant (through their appointed and appropriately qualified aviation experts) has undertaken objective, evidenced impact assessments and concluded aviation operations can continue safely. The Applicant and NGC agree powered aircraft can continue to operate in the presence of the Project with a sufficient safety margin (see Matter 7.4 within **8.3.37 Final Statement of Common Ground – Tibenham Aerodrome (Revision C)**). In relation to gliding, the Applicant has sought engagement with NGC on appropriate operational parameters to be considered within

Reference	Question	Applicant’s Response
		impact assessment and mitigation, having mutually recognised the lack of authoritative clarity in these areas (see SS 1.8 of **8.9.1 Applicant’s Responses to First Written Questions [REP3-074**]). NGC has not meaningfully engaged, however, but constructive engagement with the BGA has agreed key parameters, providing, from the Applicant’s perspective, verification of the Applicant position that gliding operations can continue safely, with minimal changes to current procedures (see b) below). NGC has stated the Project as an obstacle forms an unacceptable aviation safety risk but has not provided objective evidence to substantiate this position and justify changes to the Project design on this basis. Importantly, although it continues to argue (contrary to the Applicant’s evidence) that two of its seven runways would not be safe, it does not state that the aerodrome would close for safety reasons as a whole. Thus even on its own case, there are no safety reasons for the closure of the aerodrome. Suggestions that the club might close for commercial reasons are unevidenced and speculative. This absence of evidence of safety or viability issues includes the report provided by NGC’s appointed aviation consultant (Page 271 of **8.4.9 Applicant’s Comment on any Further Information or Submissions Received by Deadline 3 [REP4-298] and pages 257 to 259 of 8.8.1 Applicant’s Comments on Written Representations [REP2-029]** refer). With further regard to mitigation, NGC is repeating the incorrect assertion that the NPPF ‘agent of change’ principle should be interpreted in this instance as the Applicant having sole responsibility to avoid impact. That is not how the relation between aerodromes and applications for infrastructure of critical national priority is intended to work. SS 2.4 within **8.9.2 Applicant’s Response to Second Written Questions [REP5-211]** comprehensively redresses this matter. NGC states they would have no option but to close (two) runways to mitigate adverse impacts. The Applicant position is that this undertaking is not proposed to be necessary and, whilst changes to the Project design are not justified, alternative mitigations exist to address residual impacts, including reasonable changes to aerodrome operational procedures (see Matter 7.5 within **8.3.37 Final Statement of Common Ground – Tibenham Aerodrome**

Reference	Question	Applicant's Response
		(Revision C) and b) below for detail). The Applicant has sought the operator's review of the possibility of agreeing these changes, in accordance with paragraph 5.5.50 of NPS EN-1 (2024). NGC did not engage in discussions of this matter during the 29 June 2026 meeting, however, and left prematurely. NGC has not provided evidence of demonstrable risks or harm of operational procedural changes (see NPS EN-1 (2024) paragraph 5.5.51), either to safety or in terms of socio-economic impacts (see also Matter 7.6 within **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome (Revision C).** **Norfolk Gliding Club comments on any further information or submissions received by deadline 5 [REP6-220]** focus on the Applicant's dialogue with Tibenham aerodrome on matters outstanding. NGC has incorrectly maintained that the Applicant has withheld information, as well as our accordance with the 'agent of change' principle (addressed by SS 2.4 within **8.9.2 Applicant's Response to Second Written Questions [REP5-211],** as above). This unfounded position has meant the Applicant's attempted constructive, collaborative engagement with the operator to discuss impact assessment conclusions and reasonable mitigation options has not been allowed to progress by the operator. The matter of 'withheld information' has been addressed within **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (**[REP2-254]** on page 262) and **8.4.9 Applicant's Comments on Any Further Information or Submission Received by Deadline 3 [REP4-298]** (pages 276 to 277) within which the Applicant cites the information shared to explain route development rationale, consideration of consultation feedback, aviation impact assessments, design decision making and recommended mitigation measures. The Applicant has not agreed to commit in writing to incorrect and misleading assertions that set out a deficient approach to assessment of impacts and consultation, however, instead explaining our positions on matters outstanding within **8.3.37 Final Statement of Common Ground – Tibenham Aerodrome (Revision C).** The Applicant has not provided detailed costings for diversions of the overhead line outside the aerodrome safeguarding zone, nor for undergrounding within the zone, as these operator-proposed

Reference	Question	Applicant's Response
		mitigations have not been developed as alternatives, as they are not justified having regard to the guidance. The information does not, therefore, exist. Indicative costs have been provided (see pages 276 to 277 of **8.4.9 Applicant's Comments on Any Further Information or Submission Received by Deadline 3 [REP4-298]**). It is disappointing that NGC has declined to contribute to the SoCG since June 2025 when this is an established, appropriate means of providing both parties, as well as the Examining Authority, with clarity of respective positions in relation to matters outstanding. This is counter to NPS EN-1 (2024) paragraph 5.5.5 which states it is essential for aerodrome operators to work collaboratively with energy infrastructure developers essential for net zero.The SoCG has been submitted at Deadline 7 unsigned and recognising matters are unlikely to be resolved between the two parties. b) Section 6 of **8.3.89 Signed Statement of Common Ground – British Gliding Association (Revision C)** lists the gliding-specific operational parameters agreed between the Applicant and the BGA following a series of in-depth technically-focused engagements to progress matters relating to impact assessment and mitigation. NGC has been invited to all meetings but, until 29 June 2026, has declined to attend. The engagements have involved quantitative modelling to test parameters and associated assumptions. Key parameters agreed include minimum heights of glider at an aerodrome boundary on approach and acceptable overhead line clearances. The Applicant and the BGA have mutually recognised lowest safe height for turns for aerotow after take-off to be subjective; whilst the Applicant considers a lower minimum height to be reasonable, we applied the BGA's higher parameter to subsequent modelling (see below). The Applicant and the BGA have also agreed a definition of glider approach and a range of typical glide angles to characterise glider performance. The Applicant's position within Matter 7.4 of **8.3.37 Final Statement of Common Ground – Tibenham Aerodrome (Revision C)** concludes that application of these parameters, and conservative and evidenced reasoning, has verified impact assessment conclusions that Project overhead line clearance margins at Tibenham are adequate. For aerotow

Reference	Question	Applicant’s Response
		take-offs, modelling of the BGA’s minimum safe turn commencement height achieved a horizontal clearance from the overhead line well in excess of the minimum safe lateral clearance applied as a Project design parameter. For approaches, application of the agreed minimum vertical clearance resulted in a recognised reasonable range of projected approach heights, accommodating varied glider performance and approach angles. Matters 7.1 and 7.2 of **8.3.89 Signed Statement of Common Ground – British Gliding Association (Revision C)** record the BGA’s residual concerns regarding glider approaches from a particularly low height with a shallow glide angle. The Applicant position is this scenario is not typical, and that reasonable mitigation options exist to address this risk (see below). With regards to mitigations for competition flying, the Applicant and the BGA agree that the potential exists for NGC as the host of gliding competitions to define finish lines or rings that respond to the presence of the Project as an obstacle and that this is in the existing scope of BGA competition rules. Suggested line finish heights were agreed to achieve minimum clearances of the overhead line, and ring finish heights set to ensure adequate clearances were agreed to be reasonable and consistent with finish heights at other competitions. Dependencies on operator engagement to consider and agree appropriate mitigations are recognised within Matter 7.3 of **8.3.89 Signed Statement of Common Ground – British Gliding Association (Revision C).** Matter 7.4 of **8.3.37 Final Statement of Common Ground – Tibenham Aerodrome (Revision C)** outlines additional mitigation options suggested to address residual risk at the aerodrome and maintain safe gliding operations. This includes measures to enhance glider pilot awareness of the obstacle and pre-flight planning, and operator implementation of local height restrictions over the overhead line to discourage particularly low/shallow approaches, discussed at the 29 June 2026 meeting with NGC and the BGA. The operator did not provide a position on the possibility of implementation during the meeting, nor subsequently.

Priory Farm Aerodrome

a) **Priory Farm Aviators written post-hearing submission [REP6-227]** responds to the Applicant's oral submission at ISH4 (see **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**). It focuses on the oral update provided regarding the Applicant's meeting with the operator on 12 June 2026 and discussion of the aerodrome 500ft circuit.

The operator appears to have misinterpreted the Applicant's understanding of the aerodrome circuits. As explained within Applicant correspondence of 19 June 2026 and Matter 6.2 within **8.3.36 FinalStatement of Common Ground – Priory Farm airfield (Revision C)** the Applicant is clear that the aerodrome has both 1000ft and 500ft circuits. Previous assessment of both circuits was based on hand-drawn circuits published on the operator website and directly shared with the Applicant in July 2023. The circuits published within SkyDemon (we are content to refer to them as such, rather than re-plotted, if preferred) were noted at the recent meeting to differ from the hand-drawn circuits and we are seeking to establish which versions of the circuits are flown (the hand-drawn version remains on the website, for example). This is important as the hand-drawn version of the 500ft circuit (as well as the 1000ft circuit) overflies the overhead line, but it appears that the SkyDemon version of the 500ft circuit does not.

The Applicant and the operator had a shared understanding that the proposed Project overhead line bisected the 500ft and 1000ft circuit patterns. The operator's correspondence of 13 September 2025 states this was accepted at the meeting held on 7 August 2025, when the operator's 3D model was also presented. The Applicant's comments within ISH4 regarding this meeting having been the last opportunity to speak with the operator, refer to meeting proposals made thereafter but rejected by the operator, having been conditional on advance provision of written documents perceived to have been withheld (the engagement chronology within Section 5 of **8.3.36 Final Statement of Common Ground – Priory Farm airfield (Revision C)** refers). It is unfortunate that constructive engagement between the parties has not progressed until recent weeks as the circuit anomalies may have been realised at an earlier stage.

Reference	Question	Applicant's Response
		Notwithstanding, the Applicant has provided a timely updated impact assessment and suggested potential mitigation options to progress discussions. The post-hearing update for 7.2c within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** refers to the operator's initial response to the suggested mitigation in terms of a slight amendment to the [SkyDemon published] 500ft circuit not being feasible due to deconfliction with Tibenham Aerodrome. The Applicant and the operator had arranged to meet on 22 June 2026 to discuss impact assessment and mitigation matters but the operator did not attend. Section 5 of **8.3.36 Final Statement of Common Ground – Priory Farm airfield (Revision C)** records the Applicant's attempts to meet the operator thereafter. Operator amendments to the SoCG state these matters are unlikely to be resolved bilaterally, however. The Applicant position on mitigation (see Matter 7.5 within the SoCG) recognises the potential for further discussion of options, including . changes to operational procedures which could involve the creation of a circuit pattern at a different track or height (800ft, for example) to increase vertical or horizontal clearance from the overhead line, and ceasing operation of the 500ft circuit, if deemed necessary. The Applicant has previously drawn comparisons between Priory Farm and the example of Plaistow Farm, which operates with an existing overhead line in close parallel proximity and overflown by its 800ft circuits (see Annex B of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]).** This comparison remains valid as illustrates the realities of obstacle treatment in aviation. The Applicant's position is that its suggestions are reasonable and aligned with paragraph 5.5.7 of NPS EN-1 (2024) which recognises that it may be possible to adapt flight patterns to work alongside new energy infrastructure without unacceptably impacting aviation safety. **Raydon Wings Aerodrome** a) **Raydon Wings Aerodrome Comments on any Further Information or Submissions received by Deadline 5 [REP6-230]** suggests the

Applicant’s response to GEN1.20 within **8.9.1 Applicant’s Responses to First Written Questions [REP3-074]** and also our response to 5.1c within **8.4.12 Applicant’s Comments on Post-Hearing Submissions and Interest Party Action Points [REP5-194]** are inaccurate. This is incorrect. The Applicant has correctly advised it has not received feedback from the Civil Aviation Authority (CAA) itself, the statutory body with regulatory responsibilities who were notified of the Statutory Consultation. The Applicant has confirmed its engagement with the non-regulatory advisory group, the CAA’s Airfields Advisory Team (AAT), until their disbandment in March 2025. The letter shared with the Raydon Wings representation is the Position Statement provided by the CAA AAT prior to disbandment. Our response within **[REP5-194]** references paragraphs 3.17.7 to 3.17.9 of **8.8.2 Applicant’s Comment on Local Impact Reports [REP2-030]** which directly respond to the feedback relating to Raydon Wings within this Position Statement. The letter is not from the CAA’s Combined Aerodrome Safeguarding Team (CAST) as incorrectly stated by the respondent. The CAST has not provided representation in relation to the Project.

With regards to the operator’s comments on the rate of engine failure suffered by piston-engined light aircraft, the Applicant stands by its submissions to date. The rate quoted by the operator is commonly available on the internet and is frequently cited but has no reliable source. The figure given is not available directly from the US National Transport Safety Board (NTSB, which is independent and not part of the Federal Aviation Administration (FAA) as mistakenly asserted by the operator) as the NTSB only maintains the database from which the quoted statistic may have been derived. It is therefore unclear how any individual has used the database information to arrive at the quoted figure, which is the reason that the Applicant has not used it favouring instead the well-referenced Australian Transport Safety Bureau (ATSB) study referenced in our previous submission (see Action 5 (forth bullet) of **8.5.8 Applicant Response to Issue Specific Hearing 2 Action Points [REP4-303]**). The rate used by the Applicant is based on the mean failure rate given in that report for the most common engine types in the UK general aviation fleet. Specifically, the highest rate (referred to by the operator in his submission) is not used by the Applicant as it refers to a well-documented

Reference	Question	Applicant's Response
		airworthiness issue (detailed in the same report) with an engine type not common in the Uk fleet and is therefore of no direct relevant to the impact assessment for the Project. The Applicant's post hearing update at 7.2d within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** stated that the Applicant is not currently pursuing changes to the location of the Cable Sealing End (CSE) compound or the overhead line in the vicinity of the aerodrome. Furthermore, due to the absence of requested evidence to justify re-consideration of alternative locations and the Applicant's confidence in its original impact assessment, the Applicant now confirms it will not be pursuing any further design changes. Matter 7.5 within **8.3.35 Final Statement of Common Ground – Raydon Wings Aerodrome (Revision C)** records that, on 10 July 2026, the operator provided high-level descriptions of potential business approaches since 2022 but with insufficient detail to enable the Applicant's further assessment of the implications of these foregone opportunities for the aerodrome and the local economy. On 15 July 2026, the operator shared a copy of its Project-specific Hazard Identification (HAZID) and Risk Assessment, dated 2025. Applicant observations made in the limited time available at this late stage are that the risk assessments provided are subjective, with no evidential basis to justify (or scale to explain) scores provided. Existing aerodrome activities are not differentiated from aspirational operations, making it difficult to distinguish realistic risks from hypothetical scenarios. The Applicant has not received requested information regarding the position of the aerodrome aerobatic practice 'box' and 'display lines' (understanding these are used for aerobatic practice only; the location is not authorised for displays) to inform its position on whether requested substantial changes to the Project design would be appropriate and effectively minimise any evidenced impacts, and well as whether changes to operational procedures would provide a reasonable alternative mitigation. Matter 7.7 within **8.3.35 Final Statement of Common Ground – Raydon Wings Aerodrome (Revision C)** refers. It is to be noted that at

Reference	Question	Applicant's Response
		no stage has the operator formally indicated that the aerodrome's existing use would be required to be halted. b) As noted above, Matter 7.5 within **8.3.35 Final Statement of Common Ground – Raydon Wings Aerodrome (Revision C)** records that, on 10 July 2026, the operator provided high-level descriptions of potential business approaches since 2022 but with insufficient detail to enable the Applicant's further assessment of the implications of these foregone opportunities for the aerodrome and the local economy.
7.2	**Wattisham Station** The applicant confirms at deadline 6 **[REP6-118]** that agreement has been virtually met concerning effects on Wattisham Station, with outstanding matters solely relating to the exact wording of requirements within the draft DCO **[REP6-030]**. Please provide an update and confirm (or otherwise) your agreement with the applicant.	*Not addressed to Applicant*

8. Socio-economics, Recreation and Tourism

Reference	Question	Applicant’s Response
8.1	**Employment and Skills Plan** Essex CC **[REP6-147]** and Suffolk CC **[REP6-165]** raise concerns regarding the ESP. For example, the outline ESP lacks sufficient detail, certainty, governance or evidence to demonstrate that workforce, skills and employment impacts have been fully understood or will be effectively managed, the matter of supply chains and inadequate consideration of the context of the scale, complexity and cumulative nature of demand arising from multiple projects across Norfolk, Suffolk and Essex. The ExA is concerned at the lack of focus from the applicant on socio-economics matters, and is not satisfied in regard to the concerns raised in local impact reports (Essex CC **[REP1-161]** and Suffolk CC **[REP1-178]**) relating to ESPs. Indeed Suffolk CC advises it "…remains concerned that the absence of this evidence limits the ability to understand the scale and nature of workforce demand arising from the Project and, in turn, restricts the ability to assess the significance of socio-economic effects and determine	The Applicant respectfully does not agree that there has been a lack of focus on socio-economic matters. Socio-economic effects have been assessed within **6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]**, whilst the **8.13 Outline Employment and Skills Plan [Revision B]** (OESP) has been prepared to establish the framework through which employment, skills and supply chain opportunities will be delivered. Relevant socio-economic effects have therefore been considered through both the ES and the OESP, each serving distinct but complementary purposes. The Applicant does not agree that the OESP is unsupported by an appropriate evidence base. The OESP is an outline, benefit-led document which establishes the framework, governance arrangements and commitments that will guide the development of the Final ESP. It is not intended to provide a detailed assessment of workforce, labour market or supply chain effects. Socio-economic effects are assessed separately within **6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]**. The level of detail provided in the OESP is proportionate to the current stage of the Project. The Applicant also notes that workforce demand should be considered in the context of the scale and nature of the Project which is linear, resulting in a more dispersed workforce than would be expected with a single site project. Whilst Norwich to Tilbury represents a significant infrastructure investment, its peak construction workforce is also substantially lower than that associated with major projects such as Sizewell C. Many of the jobs created will be of a specialised nature with general civils construction skills likely to be the predominant area of overlap with other NSIPs. The Applicant is confident in the capacity of the civils supply chain.

Reference	Question	Applicant's Response
	whether appropriate evidence-led mitigation can be identified and secured at the pre-consent stage, consistent with the expectations of NPS EN-1." The applicant should revisit its outline ESP with a view to ensuring it adequately addresses the concerns raised, including utilising established mechanisms such as that referenced by Suffolk CC (ie the Regional Skills Coordination Function). Should the applicant choose not to amend the outline ESP, it should provide a full and reasoned justification as to how it considers the evidence submitted to date provides adequate evidence to enable the ExA to understand the scale and nature of workforce demand arising from the proposed development. In doing so, the applicant should provide evidence that adequately assesses the significance of socio-economic effects and that clearly defines appropriate evidence-led mitigation that has been or can be identified and secured at the pre-consent stage. The applicant should demonstrate this is consistent with the expectations of NPS EN-1.	National Grid has established the Great Grid Partnership (GGP) to support the delivery of the Project and other Accelerated Strategic Transmission Investment (ASTI) schemes. Through the GGP workforce requirements continue to be reviewed and refined, enabling early workforce planning, resource management and the proactive management of known shortages in specialist transmission roles across the wider portfolio. The Applicant is therefore confident that cumulative workforce and supply chain pressures have been appropriately considered. The Applicant does not agree that the OESP should function as a mitigation document. As set out within the OESP, its purpose is to maximise employment, skills and supply chain opportunities arising from the Project. Relevant socio-economic effects are assessed within **6.15 Chapter 15: Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]**, which concludes that there are no significant adverse effects on socio-economic, recreation or tourism receptors arising from the construction, operation or decommissioning of the Project that require mitigation through an ESP. The ES does not rely on the OESP to mitigate significant adverse effects. This distinction is important. Unlike management plans such as the CoCP or NVMP, which are required to control identified environmental effects, the OESP is a benefit-led document intended to maximise employment, skills and supply chain opportunities arising from the Project. (Please refer to **8.30 Response to Rule 17 Letter received 30 June 2026 Final Issue A [REP6-132]** for further expansion on this point)**.** The Applicant therefore considers that the approach is consistent with NPS EN-1, which requires significant adverse effects to be assessed and mitigated where necessary, whilst recognising the positive socio-economic benefits and legacy opportunities that major infrastructure projects can deliver. Notwithstanding the Applicant's position, the Applicant has reviewed and updated **8.13 Outline Employment and Skills Plan [Revision B]** in response to the representations from Essex County Council Suffolk County Council (and other local authorities). The revised OESP strengthens commitments relating to governance, stakeholder engagement, monitoring

Reference	Question	Applicant's Response
		and review, collaboration with the Regional Skills Coordination Function (RSCF), workforce planning, support for local businesses and SMEs, and coordination with other major infrastructure project promoters, and the sharing of workforce and supply chain intelligence. Additionally, notwithstanding the Applicant's view, Requirement 15 (**3.1 Draft DCO [Revision G]**) has been amended and now requires the Final ESP to be approved by the relevant host county and unitary authorities prior to commencement of development. The Applicant therefore considers that the revised OESP and Requirement 15 provide an appropriate framework for the preparation, approval and implementation of the Final ESP.

9. Water environment - flood risk, hydrology and drainage

Reference	Question	Applicant's Response
9.1	In its ISH4 post-hearing submission **[REP6-158]** Norfolk CC continues to raise concerns about infiltration rates not being undertaken and therefore concerns about the full assessment of drainage requirements and compliance with NPS EN-1. In your comments to responses at deadline 5 **[REP6-115]** you state.. "The information the LLFA requests on infiltration testing will be provided following the DCO Examination as secured by the Surface Water Management Plan that is secured via commitment GG22 within 7.2 Outline Code of Construction Practice **[Revision F]**. The Applicant will follow the discharge hierarchy set out in Section 5.3 of 8.2 Drainage Strategy DCO [Revision C]. As stated in this section, appropriate justification will be provided for any progression between the hierarchy levels". How can the ExA be satisfied that, taking account of the acknowledged lack of infiltration testing results, the flood risk assessment is accurate and there will be sufficient land and ability to provide any resulting sustainable drainage systems (SuDS) infrastructure.	The Applicant has set out their full response to Norfolk County Council Lead Local Flood Authority in **8.4.18 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]**. The Applicant would like to reiterate the key points relevant to the two matters raised by the Examining Authority. The Applicant considers the Drainage Strategy to be proportionate for the nature and scale of the Project and that it satisfies the minimum requirements of EN-1 (2024) paragraph 5.8.15. Section 5 of **8.2 Drainage Strategy DCO [REP6-096]** sets out the proposed approach to managing and discharging surface water through sustainable drainage systems (SuDS), accounting for climate change and following the National Standards for Sustainable Drainage Systems. The design has applied the discharge hierarchy in principle by seeking to replicate existing drainage processes within each catchment as closely as practicable. The proposed SuDS measures and discharge methods have been developed taking account of site-specific constraints, available ground conditions information, flood risk, existing surface water flow paths and existing drainage networks. The Applicant therefore considers the selected SuDS measures and discharge methods to be appropriate and capable of providing sustainable and effective management of surface water runoff. The Order Limits and associated class of rights sought by the Proposed Development are proportionate and provide sufficient land to provide any resulting sustainable drainage systems (SuDS) infrastructure, following the discharge hierarchy. The Applicant does not consider it proportionate (or necessary to the production of an accurate flood risk assessment) to undertake infiltration testing along the entire route prior to the grant of development consent. In

Reference	Question	Applicant's Response
	Also provide comment on Norfolk CCs assertion that not including infiltration rates does not comply with EN-1.	accordance with EN-5 paragraph 2.9.14 and EN-1 paragraph 4.1.2, National Grid has a statutory duty to develop an efficient, coordinated and economical system. The drainage strategy and scope of ground investigations undertaken to date have therefore been developed on a proportionate basis, balancing technical requirements, environmental considerations, and the cost and programme implications of undertaking route-wide infiltration testing. By undertaking this assessment and presenting the outline mitigation strategy within **8.2 Drainage Strategy DCO [REP6-096]**, the Applicant considers that it has complied with the requirements of EN-1 and in particular satisfies the following requirement in Paragraph 5.8.15 EN-1 (2024), specifically with regard to how the Applicant should '*consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include:* *iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate* *iv. Demonstrate how the hierarchy of drainage options has been followed.* *v. Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate.'* The Applicant considers that sufficient information has been provided at this stage to demonstrate that an appropriate and policy-compliant drainage solution can be developed through the detailed design process within the Order Limits sought by the Proposed Development. Not withstanding this, infiltration testing is not considered necessary in all locations. Existing ground investigation data, published geological mapping and other site-specific information may already demonstrate that infiltration drainage would be unsuitable. Where available evidence indicates that infiltration is unlikely to be feasible due to prevailing ground conditions, groundwater levels, contamination constraints or other site-specific factors, further infiltration testing would not materially influence the drainage

Reference	Question	Applicant's Response
		strategy and the Applicant suggests it is reasonable to progress to the next level of the drainage hierarchy, when considering the DCO Order limits required for the Project. The detailed design will be informed by the detailed ground investigation programme to be undertaken across the Project route. Where the findings of the ground investigations corroborate the conclusions of the desktop assessment and indicate that infiltration is unlikely to be feasible, further infiltration testing would not be necessary. Conversely, where the investigations identify potentially suitable ground conditions for infiltration, additional site-specific infiltration testing will be undertaken where appropriate to support the detailed drainage design in compliance with the drainage hierarchy.

Appendix A.
Copy of MOD Land Management Services (LMS) Consent

Appendix A Copy of MOD Land Management Services (LMS) Consent

From: [redacted]
Sent on: Wednesday, July 15, 2026 8:54:57 AM
To: NorwichToTilbury@planninginspectorate.gov.uk
CC: [redacted]
Subject: [EXTERNAL] 20260715 - Land Management Services-Response - Norwich-to-Tilbury DCO

Follow up: Follow up
Start date: Wednesday, July 15, 2026 12:00:00 AM
Due date: Wednesday, July 15, 2026 12:00:00 AM

Exit full screen

Dea [redacted]

I write on behalf of the Ministry of Defence ("**MoD**") Land Management Services ("**LMS**").

The MoD is a Crown authority for the purposes of Section 135 of the Planning Act 2008 and is the beneficiary of existing rights in certain plots of land situated within the Order limits for the proposed Norwich to Tilbury Project (the "**Project**"). The plots of land in question are as follows:

1. Plots 16/76, 16/81 & 16/83 (Section B);
2. Plots 17/39,17/48, 17/49, 17/50, 17/52, 17/54, 17/55, 17/58, 17/59, 17/60, 17/61, 17/62, 17/63,17/64, 17/65, 17/66, 17/67, 17/70, 17/76, 17/85 (Section B);
3. Plots 6/38, 6/39, 6/41, 6/42, 6/52, 7/1, 7/2, 7/3, 8/1, 16/23 (Section C);
4. Plots 16/23a, 16/26, 16/30, 16/33, 16/34, 16/36, 16/36a (Section C); and
5. Plots 6/24e, 6/71, 6/71f, 6/84a (Section H).

National Grid Electricity Transmission Plc (the "**Applicant**") has confirmed that, once made, The National Grid (Norwich to Tilbury) Order 20[xx] (the "**Order**") will not include any provision(s) authorising the compulsory acquisition of third party interests in land belonging to the MoD LMS and, as such, no consent pursuant to Section 135(1) has been sought in connection with the Order.

Section 135(2) consent is, however, required for an order granting development consent to include provision(s) which apply to Crown land or rights benefiting the Crown.

Please, therefore, accept this email as constituting the MoD's written consent, issued pursuant to and for the purposes of Section 135(2) of the Planning Act 2008, to the inclusion of such provisions currently within the draft Order as may apply in relation to each of the plots of land listed above. For the avoidance of doubt, the MoD also confirms its consent to the inclusion of Article 42 (Crown rights) within the draft Order.

This consent is given on the basis of the draft Development Consent Order (Revision E) [**REP5-065**] and accompanying application documents currently before the Examining Authority.

The MoD LMS confirms that this email is provided for the purposes of Section 135 of the Planning Act 2008 only and may be relied upon by the Applicant, the Examining Authority and the Secretary of State in the examination of the Order.

Yours faithfully,

[redacted] (Acting) Assistant Deputy Head of Estates
Defence Infrastructure Organisation | National Armaments Director Group
Estates Division – Land Management Services
Swales Pavilion, RAF Wyton, Huntingdon, PE28 2EA
[redacted]

[Instruction Form - DIO Estates - Land Management Services]
Unless otherwise stated all correspondence is Subject to Contract and Without Prejudice.

National Armaments Director Group

Appendix B.
Green Infrastructure

Appendix B Green Infrastructure

B.1 Green Infrastructure

B.1.1 The Essex Local Nature Recovery Strategy (LNRS) was published in July 2025, just before the development consent application was submitted. The Norfolk and Suffolk LNRSs were both published after the submission of the application in October 2025. However, the draft Essex, Norfolk and Suffolk LNRSs were available prior to submission of the Application and were reviewed and taken into consideration. The Applicant considers that the LNRSs have been embedded within the Project's mitigation, compensation and enhancement strategies through both the design of the Project and the commitments secured through **7.4 Outline Landscape and Ecological Management Plan [Revision G**], 8.28 Outline Offsite Planting Delivery Scheme **[REP6-128]** and **7.1 Biodiversity Net Gain Strategy [APP-299]** and compensation Article wording included in **3.1 Draft DCO [Revision G]**. The approach taken by the Applicant is in accordance with NPS EN-1 (2024).

B.1.2 It is important to note the Project is a predominantly linear development, and as such, it is fundamentally different in nature from other site-based or area-based projects. The location and design of the transmission infrastructure is principally influenced by engineering, operational, safety and environmental constraints and, consequently, opportunities to incorporate extensive on-site habitat creation throughout the operational corridor are inherently more limited than might be the case for a project of a different nature. In addition, the majority of land affected by the Project is required only temporarily during construction. Following completion of the works, these areas would be reinstated and returned to the relevant landowner for their existing use, predominantly agriculture. Consequently, the Project does not provide widespread opportunities for permanent land use change or the establishment of extensive areas of new habitat within the working corridor.

B.1.3 LNRS are designed to promote the delivery of offsite biodiversity gain in the right places[1]. Therefore, using the LNRS for off-site provision (see section on enhancement below) can result in better overall outcomes for biodiversity and allows for the need to balance BNG requirements with statutory duties.

B.1.4 The Applicant has however sought to embed LNRS objectives and contribute to green infrastructure objectives whenever reasonably practicable and proportionate. This has been achieved through the commitment to route-wide reinstatement planting proposals, the identification and design of Environmental Areas around permanent infrastructure, habitat enhancement measures, compensatory planting proposals, biodiversity net gain delivery and commitments requiring consideration of the relevant LNRSs during detailed design and implementation. These measures support biodiversity, landscape character, ecological connectivity, climate resilience, natural capital and wider ecosystem service benefits across Norfolk, Suffolk and Essex.

B.1.5 The Applicant has provided below detailed examples of how the LNRSs have been considered in relation to mitigation, compensation and enhancement measures provided by the Project.

[1] Natural environment - GOV.UK

B.2 Mitigation

Reinstatement Planting

B.2.1 The Applicant has stated within paragraph 9.4.2 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]**, that the '*relevant LNRS will be considered for hedgerow reinstatement, with specific consideration of the type of hedgerow to be reinstated in any one location and the specific species that should be included within the planting mix*'.

Environmental Areas

B.2.2 The Project includes seven Environmental Areas around the permanent assets which offer the opportunities for further alignment with the relevant LNRSs. The Environmental Areas were reviewed against the draft LNRSs as detailed in **7.1 Biodiversity Net Gain Report [APP-299]**. Indicative details of the landscape proposals are provided in **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision D]**.

B.2.3 The Applicant's response to ExQ1 BIO 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** details how the LNRSs has been considered in relation to each of the Environmental Areas. Key text from this response has been provided below for ease of reference.

B.2.4 **Norwich Substation Environmental Area (Norfolk LNRS):** *The existing woodland strip along the southern boundary has been identified by the LNRS as offering potential for Deciduous Woodland Restoration [PM02]. As part of the indicative landscape plan and BNG assessment this area has been identified as retained woodland to be enhanced, aligning with the LNRS. Woodland planting is proposed in the south east corner, to connect the woodland strip to the south of the boundary and Dunston Hills; two areas of woodland identified in the LNRS as potential areas for Deciduous Woodland Restoration [PM02]. The condition of the existing scrub habitat in the Environmental Area is also proposed to be improved. The woodlands and scrub habitats are to be linked with new planting to create an ecological network that is bigger, better and more joined up to provide benefits to biodiversity in alignment with the goals of the Norfolk LNRS*.

B.2.5 ***Wenham Grove CSE Compound (Suffolk LNRS):*** *The Wenham Grove Environmental Area sits entirely within areas identified by the LNRS as a potential area for Deciduous Woodland Creation [PM01], Scrub Creation [PM07], and Other Neutral Grassland Creation [PM19], with the potential to create a mosaic of all three habitats. As part of the indicative landscape proposal and BNG assessment, it is proposed to plant a mosaic of other neutral grassland, mixed scrub, and mixed woodland planting aligning with the LNRS. This new woodland planting would be linked to existing woodland blocks with surrounding scrub habitat, and native tree planting. Woodland and scrub planting is also proposed next to Wenham Grove woodland, providing benefits to woodland flora and fauna. Existing woodland blocks within the Environmental Area have been identified by the LNRS as offering potential for Deciduous Woodland Restoration [PM02]. As part of the indicative landscape plan and BNG assessment these areas of woodland have been identified as retained woodland to be enhanced, aligning with the LNRS*.

B.2.6 ***EACN Substation (Essex LNRS):*** *The Environmental Area is not located in any 'Strategic Opportunity Areas' identified by the LNRS. However, the Essex LNRS does identify the EACN Environmental Area as a 'Potential Opportunity Area' for woodland, grassland and scrub creation. 'Potential Opportunity Areas' for woodland within the Environmental Area range from Value Index Categories '55 65% to '5-15%', and as part of the indicative landscape plan and BNG assessment this will include new woodland planting within all these categories. 'Potential Opportunity Areas' for grassland range from Value Index Categories '15-25%' to '0.01-0.5%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories. 'Potential Opportunity Areas' for scrub within the Environmental Area range from Value Index Categories '55-65%' to '0.01-5%', and as part of the indicative landscape plan and BNG assessment the Project will create scrub within all these categories.*

B.2.7 ***Great Horkesley (EACN side) CSE Compound (Essex LNRS):*** *The Environmental Area lies adjacent to Harrow Wood Local Wildlife Site and is located entirely with a LNRS 'Strategic Opportunity Area' for woodland and scrub creation and within a 'Strategic Opportunity Area' for woodland enhancement. As part of the indicative landscape plan and BNG assessment it is proposed to plant woodland and scrub habitats and enhance the existing plantation woodland within the Environmental Area, aligning with the LNRS. The Environmental Area is also within a 'Potential Opportunity Area' identified in the LNRS for grassland ranging from Value Index Categories '65-75%' to '25-35%', and as part of the indicative*

B.2.8 ***Great Horkesley (Tilbury side) CSE Compound (Essex LNRS):*** *The Environmental Area is partly within a 'Strategic Opportunity Area' identified within the LNRS for woodland and scrub creation. As part of the indicative landscape plan and BNG assessment, woodland and scrub planting is proposed in these areas aligning with the LNRS. The Environmental Area is also within 'Potential Opportunity Areas' identified in the LNRS for grassland ranging from Value Index categories '45-55%' to '15-25%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories within the Environmental Area.*

B.2.9 ***Fairstead (EACN side) and Fairstead (Tilbury side) CSE Compounds (Essex LNRS):*** *The Environmental Area is not located in any 'Strategic Opportunity Areas' identified by the LNRS. However, the Essex LNRS does identify the Environmental Area as within 'Potential Opportunity Areas' for woodland, grassland and scrub creation. Potential opportunity areas for woodland within the Environmental Area range from Value Index Categories '35-45% to '5-15%', and as part of the indicative landscape plan and BNG assessment the Project will create woodland within all these categories. 'Potential Opportunity Areas' for grassland within the Environmental Area range from Value Index Categories '35-45%' to '0.01-0.5%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories. 'Potential Opportunity Areas' for scrub within the Environmental Area range from Value Index Categories '55-65%' to '5 15%', and as part of the indicative landscape plan and BNG assessment the Project will create scrub within all these categories.*

B.2.10 ***Tilbury North substation and CSE Compounds (with LTC) (Essex LNRS):*** *The Tilbury North substation and CSE compounds (with LTC) will include woodland and grassland planting within 'Strategic Opportunity Areas' identified by the LNRS for woodland and grassland creation.*

B.2.11 Final details of the landscape proposals will be provided in the final Landscape and Ecological Management Plan(s) to be submitted to and approved in writing by the relevant Local Planning Authority pursuant to Requirement 4 of **3.1 Draft DCO [Revision G]**. These final details will also consider the LNRSs, the Applicant has stated within paragraph 9.7.2 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]**:

B.2.12 'The species mixes within the final landscape designs for the Environmental Areas will be guided by the local context of each mitigation area, with reference to information from the LNRS and local wildlife organisations where available and feasible'.

B.2.13 **7.4 Outline Landscape and Management Plan [Revision G]** was updated at Deadline 6 to include reference to the LNRSs and Local Green Infrastructure Design Principle in the preparation of the Final Landscape and Ecological Management Plan. **7.16 Design Approach for Site Specific Infrastructure [REP6-092]** (DASSI) also establishes a Design Review process for the Environmental Areas proposed around substations and cable sealing end compounds. Design Reviews for these locations will be offered to include a nominated representative of the relevant Local Planning Authorities, and the local Wildlife Trust (or other similar body to be agreed). The Final Landscape and Ecological Management Plan submitted for approval under Requirement 4 will include a statement demonstrating:

- How regard has been had to the relevant DASSI design principles during the development of the detailed design
- How recommendations arising from the Design Review process have been taken into account, where appropriate, in the final details submitted for approval.

B.2.14 The LNRSs will therefore continue to be embedded at the 'secure' stage to enable design outcomes to be scrutinised, assessed and developed during the post-consent design process.

B.3 Compensation

3:1 Tree Replanting

B.3.1 The Applicant has committed to a 3:1 replacement ratio for individual trees and individual trees within small groups. All other tree habitat is assessed and mitigated through the BNG metric. Whilst the Project will prioritise replanting for individual trees and small groups of individual trees within the Order Limits, offsite provision may be required which is considered to comprise compensatory planting. The Applicant has committed to taking the relevant LNRSs into consideration as part of the site selection criteria within **7.4 Outline Landscape and Ecological Management Plan [Revision G]** (paragraph 9.3.3) and **8.28 Outline Offsite Planting Delivery Scheme [REP6-128]. 8.28 Outline Offsite Planting Delivery Scheme [REP6-128]** states in paragraph 2.3.9 that site selection criteria and opportunities for offsite tree planting will be considered having regard to, '*Alignment with the Local Nature Recovery Strategies relevant to the area as well as relevant green infrastructure networks and strategies'.*

Landscape and Visual Compensation

B.3.2 In addition to the offsite tree planting potentially resulting from the 3:1 replanting commitment for individual trees and individual trees within small groups, the Applicant has also progressed indicative landscape and visual compensatory measures in specific locations in response to Action Point 27 from Issue Specific Hearing 2 (ISH2). The proposals are detailed within **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**. The Applicant's position in relation to these measures has been clearly set out in this **[REP5-199]** and also during ISH4, as summarised in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. The Applicant will not seek to repeat this position here but should the Secretary of State consider these measures necessary, the LNRSs were utilised to identify potential compensatory opportunities.

B.4 Enhancement

B.4.1 In relation to the delivery of offsite BNG the Applicant has stated that the relevant LNRSs will be considered as part of the BNG site selection process, where sites are available and appropriate to the Project. This offsite selection process would take into consideration the potential for wider habitat connectivity and enhancement across the three counties, as well as specific areas of importance to biodiversity.

B.4.2 The Applicant is also currently in advanced negotiations with Suffolk Wildlife Trust on the Waveney and Little Ouse Recovery (WaLOR) Project regarding the potential delivery of offsite biodiversity units within the scheme. The WaLOR project aims to enhance the natural heritage of the landscape, restore habitats, improve biodiversity and deliver climate change and water management benefits i.e. multi-functional environmental outcomes. The scheme was identified by virtue of its location in relation to the Project and identification within the Suffolk LNRS as a site where creation or improvement of habitat is strong encouraged. The Applicant has provided a letter from the WaLOR Project in Appendix C to evidence the negotiations taking place. The Applicant has therefore used the Suffolk LNRS to steer BNG discussions on off-site selection process, by targeting where habitat creation will be of 'high strategic significance'.

B.5 Conclusion

B.5.1 In summary, the Applicant considers that the relevant LNRSs have been embedded within the Project's mitigation, compensation and enhancement strategies to the extent reasonably practicable and where it would be most effective, given the predominantly linear nature of the Project. The Applicant has aligned the Project with the Essex, Norfolk and Suffolk LNRSs through reinstatement planting, Environmental Areas, compensatory planting measures, biodiversity net gain delivery and commitments requiring ongoing consideration of the LNRSs during detailed design. Collectively, these measures support habitat creation, restoration and enhancement, strengthen ecological connectivity and contribute to wider nature recovery and green infrastructure objectives across all three counties. The Applicant therefore considers that green infrastructure has been addressed as a cross-cutting matter throughout the route and that the Project will make a proportionate contribution to the objectives of the relevant LNRSs and the delivery of larger, better and more joined-up ecological networks.

Appendix C. Copy of Letter from Waveney and Little Ouse Recovery Project to National Grid

nationalgrid

Appendix C Copy of Letter from Waveney and Little Ouse Recovery Project to National Grid

24/06/2026

[redacted]
By email.

WaLOR Ltd.
c/o [redacted]

Dear [redacted]

This letter sets out and confirms the current state of detailed negotiations around the delivery of off-site compensatory BNG for the Norwich to Tilbury project. Negotiations are being undertaken between the Norwich to Tilbury project and the Waveney and Little Ouse Recovery company (WaLOR ltd.)

These negotiations concern the location, volume, phasing and type of Biodiversity Units available from the WaLOR project for purchase by Norwich to Tilbury. WaLOR co. has discussed bringing forward to National Grid in the region of 600 BNG units.

The WaLOR project will be presenting:

- Very High distinctiveness wetland units associated with our wider floodplain and peatland restoration program.
- High Distinctiveness woodland units, of both Lowland Mixed Deciduous and Wet Woodland types.
- Medium distinctiveness units of woodland, grassland and scrub types.

The WaLOR project is currently in the process of producing a detailed phasing plan for National Grid's consideration. The project expects to be in receipt of formal heads of terms of a sale in the coming weeks from National Grid. The WaLOR project is currently working with the support of project member, Suffolk Wildlife Trust, in these negotiations.

The units presented form part of the wider WaLOR project, consisting of around 1500ha of land, 17 landowners, and delivering significant environmental and wider social benefits. Details of this project can be found here: https://www.suffolkwildlifetrust.org/WaLOR

Your sincerely,

[redacted]

Please direct replies to this letter, via email to:
[redacted]

National Grid plc
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