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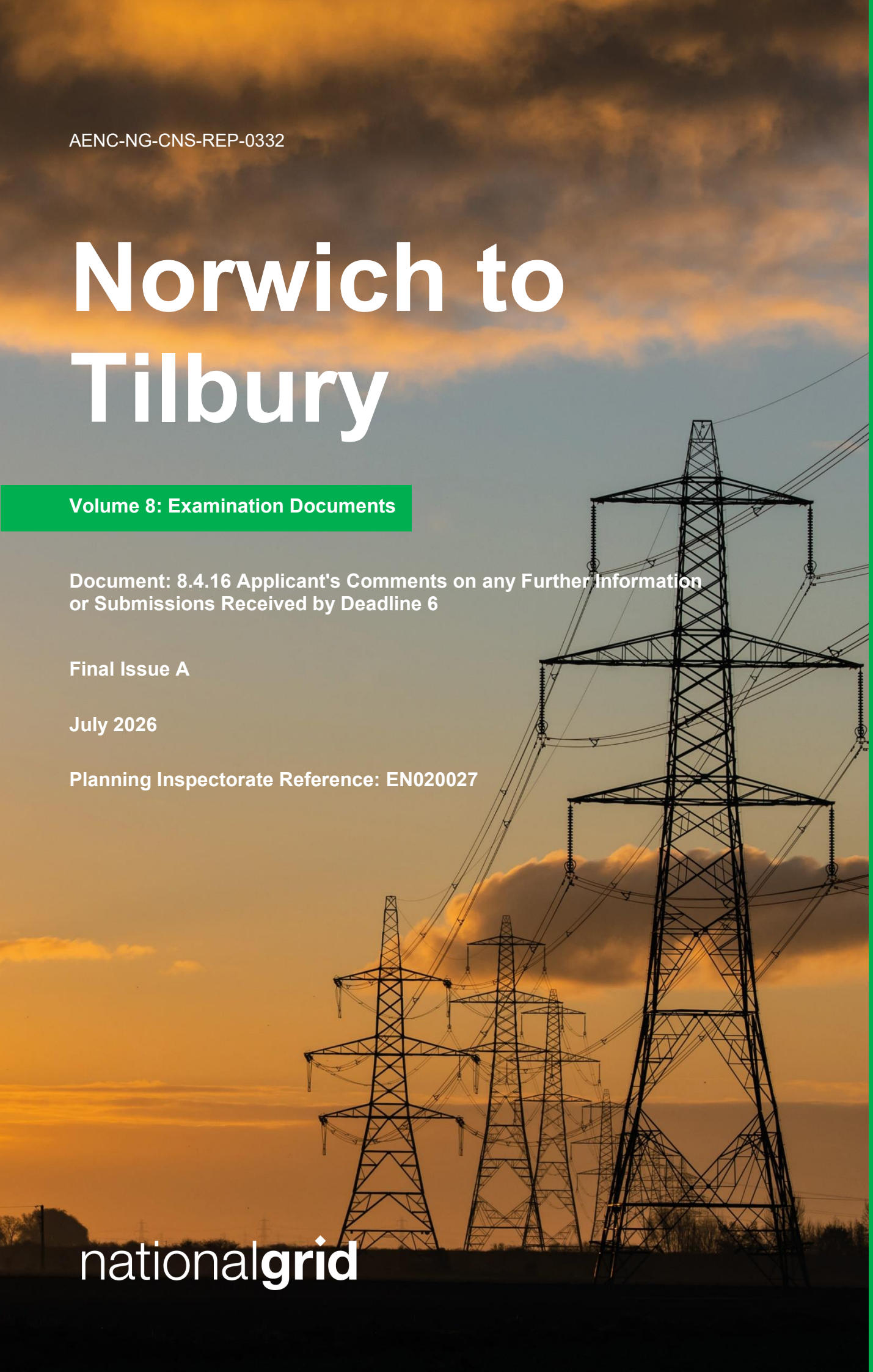

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Appendix G Applicant's Comments on Suffolk County Council submission 'Comments on submissions received at Deadline 5' [REP6-167]
Appendix H National Protective Security Authority Guidance: Operational Requirements, August 2018

1. Introduction

1.1 Purpose of this Document

1.1.1 A number of submissions by Interested Parties (IPs) and Affected Parties (APs) were accepted into the examination at Deadline 6. The Applicant has reviewed these documents and provided a response where content is directed to the Applicant and the Applicant considers it would be useful for the purposes of the examination to address a new point, provide a correction, or signpost to information provided elsewhere in the Applicant's documents that provides a response. In some cases, this is a cross reference to a response previously provided by the Applicant where this addresses the point made.

1.1.2 A number of submissions were also made by IPs in response to the Rule 17 Letter issued on 30 June 2026 **[PD-029].** The Applicant provides its comments on those responses in Section 2 of this document.

1.1.3 This document also includes, where relevant, comments made in relation to the Applicant's responses to the ExA's second written questions (ExQ2) at Deadline 5 and the Applicant's responses to the first written questions (ExQ1). As few submissions commented on ExQ1 or ExQ2, this has not been provided in a separate document and it is clearly stated where a comment in is in relation to written questions.

1.1.4 Finally, at Deadline 6, submissions were also made in respect of the hearings held in the week commencing 22 June 2026, comprising written summaries of oral submissions made at the hearings and responses to hearing action points issued at the hearings.

1.1.5 The Applicant has responded to these post-hearing submissions separately **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A].**

1.1.6 In some instances, Interested Parties provided different types of written submissions within one document. Where this is the case, the Applicant has divided the submission into the relevant Deadline 7 document and has responded as appropriate. Where there is duplication between aspects of submissions, the Applicant has sought to respond once and provide a signpost to that response in the other documents.

1.2 Appendices

1.2.1 The Applicant has provided some responses to submissions by Interested Parties, or supporting information to responses, in appendices, due to their complexity, size or presentation. The Appendices included are:

- Appendix A - Applicant's Response to Thurrock Council comments on ExQs2 [REP6-170]
- Appendix B - Additional Detailed Design Requests

- Appendix C - Applicant's Response to Essex County Council Appendix A [REP6-147]
- Appendix D - Applicant's Response to Essex County Council commentary on the Revised Draft DCO [REP5-061, Revision E]
- Appendix E - Applicant's Response to Pylons East Anglia (PEA) [REP6-229]
- Appendix F - Applicant's Responses to ARU Writtle [REP6-134]
- Appendix G - Applicant's Comments on Suffolk County Council submission 'Comments on submissions received at Deadline 5' [REP6-167]
- Appendix H - National Protective Security Authority Guidance: Operational Requirements, August 2018

2. Applicant's Comments on Deadline 6 Submissions

Table 2.1 Applicant's Comments on Deadline 6 Submissions

Examination Library ID	Name	Matter	NG Response
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	A Landscape Too Sensitive for Pylons: The Case for Protecting Ardleigh Whilst supporting the need for new energy infrastructure, delivery must properly consider less harmful alternatives to overhead pylons. In sensitive rural locations such as Ardleigh, other options, including continued undergrounding, should be fully and transparently assessed before pylons are imposed on the landscape. This submission asks the Examining Authority to require the least damaging solution for Ardleigh. National Grid has already accepted that the landscape north of Ardleigh is sufficiently sensitive to justify undergrounding; the same principle should be applied before overhead pylons are imposed on the adjoining rural landscape. National Grid's proposal to reintroduce overhead pylons shortly after the undergrounded Ardleigh section is inconsistent and inadequately justified. The landscape around Ardleigh does not suddenly become less sensitive at the proposed transition point; it remains rural, visually exposed and closely connected to homes, lanes, footpaths, farmland, heritage assets and the wider setting of Dedham Vale National Landscape. National Grid's own reasoning for undergrounding the Ardleigh–EACN section shows that undergrounding is not limited to nationally designated landscapes. It can be justified where the effects of overhead infrastructure impact the Dedham Vale National Landscape. Reference statement by the Applicant at recent Issue Specific Hearing 4: subject Landscape and Visual Effects. Transcript: 00.55.56.07 – 00.57.27.26 That same reasoning should be applied consistently to the rest of the Ardleigh area affected by the proposed re-emergence of pylons: visible from the Dedham Vale National Landscape (see attached map). The re-emergence of pylons immediately after the undergrounded section is therefore not a coherent landscape-based decision. National Grid has not shown that landscape or residential harm materially reduces at that point, nor that affected Ardleigh receptors have been assessed against the same threshold that justified the adjacent undergrounding. National Grid's decision establishes three principles: undergrounding is appropriate where	The Applicant provided its overarching position on connection routeing at Ardleigh in section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. A response to similar concerns, related to the justification of underground cables, has been previously raised by Ardleigh Parish Council and Little Bromley Parish Council. The Applicant responded in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299].** The response explained that '*2.9.20 of EN-5 states that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes.'* The Applicant has also set out its position in relation to Dedham Vale National Landscape and it's setting in paragraph 6.5.25 of **5.15 Design Development Report [APP-122]:** *'Parts of the landscape near Ardleigh are close to the edge of the area considered to form part of the setting of the National Landscape, but the Project itself around Ardleigh is not considered to be in the setting.'* The Applicant acknowledges that some of the proposed pylons would be distantly visible from parts of the National Landscape but this would not significantly affect the special qualities of the National Landscape as set out in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [Revision B]**. It is important to note that being able to see the Project does not equate to a significant effect. Paragraph 5.10.34 of National Policy Statement EN -1 (2024) states '*The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent*'. The point made by the Applicant in ISH4 relates to previous consideration of two overhead lines and a CSE compound located to the north of Ardleigh. The evolution of the Project in the vicinity of Ardleigh has sought to minimise effects as part of an iterative design and assessment process. As such the underground cables proposed through Dedham Vale National Landscape were extended all the way back to the EACN. The reason for this was not related to effects on Dedham Vale National Landscape but the potential effects of two overhead lines and a CSE compound north of Ardleigh as set out in Section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (paragraph 3.6.11)** which states: '*The Applicant would inform the ExA that a double overhead line was originally considered north of Ardleigh but following an iterative design and assessment process this was felt to be unacceptable. Therefore the Project design was changed to incorporate underground cable through the National Landscape and continued through to the EACN Substation*.'

Examination Library ID	Name	Matter	NG Response
		landscape harm is severe; long underground sections are feasible; and undergrounding can be justified outside a designated landscape where the evidence supports it. Those principles should be applied consistently to the local landscape, homes and heritage assets affected by the reintroduction of overhead infrastructure, rather than ending at an arbitrary transition point near Ardleigh.	
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Ardleigh meets the threshold for continued protection Ardleigh is not a blank or low-value corridor. It is a settled ancient rural landscape with residential properties, listed buildings, mature hedgerows, woodland, farm businesses, narrow lanes and public views across open countryside and the Dedham Vale National Landscape. Pylons will be highly intrusive in this setting, particularly where they would be experienced from homes, local roads, rights of way and heritage assets.	The Applicant has previously addressed concerns regarding the impact of the Project on the historic environment of the Ardleigh and Little Bromley Parish Councils in **8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]** (ref 5, pp. 12-20); **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (ID 15.6, pp. 381-382; ID 15.13-15, pp. 388-391); and **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]** (ID REP3-094, pp. 214-215). The Applicant is confident the Project would not result in any substantial harm to the setting of any heritage assets, and that the assessment of the historic environment in the Ardleigh and Little Bromley Parish Council areas as presented in **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]** is appropriate and proportionate. The Applicant has previously addressed concerns regarding effects on landscape and visual receptors within the Ardleigh and Little Bromley Parishes on pages 29 to 32 (Ardleigh Parish Council) and pages 535 to 539 (Little Bromley Parish Council) in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089].** Judgements on landscape value were made as part of the landscape and visual impact assessment and are set out in Annex A Landscape Value Assessment in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B]**. These value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations. This defines landscape value as 'the relative value or importance attached to different landscapes by society on account of their landscape qualities' (page 3). The value judgements of relevance to Ardleigh and Little Bromley Parishes are set out in Table A20 (Bromley Heaths Landscape Character Area (LCA)) and Table A21 (Ardleigh Valley System LCA). See response to REP6-133 above in relation to views towards the Dedham Vale National Landscape.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	The landscape does not suddenly become less sensitive EN-5 requires a consistent application of the mitigation hierarchy where significant landscape and visual effects arise. If undergrounding is justified between Birchwood Road and the EACN section, then the transition back to the A12, around the village settlement, requires a clear, evidence-based justification. Different standards appear to be applied to parts of the same rural landscape.	The Applicant sets out its position with regard to the mitigation hierarchy in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant is confident that the mitigation hierarchy was systematically applied throughout the design of the Project. See response to REP6-133 above in relation to undergrounding between Dedham Vale National Landscape and the EACN.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Potential change to the Project plan and insufficient assessment Ardleigh Parish Council understands that the Applicant is also seeking to re-route pylon(s) north of the consented Flying Trade Group warehouse at the junction of Old Ipswich Road and Wick Lane. However, the information currently available does not provide a	The Applicant understands that this comment is referring to Scenario B of 2.4 Flying Trade Group and Crown Quarry east and west of the A12 (Sections C and D) as set out in **8.11 Approach to Scenarios [Revision E**]. The Project alignment presented on **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [REP4-109]** was assessed within Section 7 (Residual Effects) of each environmental topic chapter in the ES. Sensitivity testing was then undertaken within Section 9 (Sensitivity Testing) of each environmental topic chapter to ensure that any likely significant environmental effects arising from the

Examination Library ID	Name	Matter	NG Response
		sufficiently precise or transparent basis for assessment. The exact alignment between T18 and T20 remains unclear, and there is no confirmed information on individual pylon locations, span lengths, access arrangements, construction compounds, vegetation removal or the relationship of the revised route to nearby receptors. Without this detail, the Examining Authority, residents and other parties cannot properly understand or assess the revised alignment. Clear distances from the Dedham Vale National Landscape, homes, listed buildings and public rights of way, together with verified visual representations, are needed to compare this potential change with the existing proposal, and to determine whether continued undergrounding is the less damaging and a more consistent solution.	flexibility represented by the Scenario were assessed. Specifically, 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. Paragraph 13.9.23 within **6.13 Environmental Statement Chapter 13 – Landscape and Visual [Revision B]** concluded that both the alignment presented on **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [REP4 109]** and Scenario B '*would result in similar effects on landscape features and key characteristics, and therefore there would be no change to the significance of effects on landscape character'* and *'the design scenario would bring the overhead line closer to some visual receptors, but further from others. For both options there would be close views towards the overhead line for local community receptors including residents and people travelling on the A12. Overall, there would be no change to the significance of effects on visual receptors in VRAs C11 or C12*'. **6.11 Environmental Statement Chapter 11 – Historic Environment [Revision D]** concluded in the sensitivity testing that Scenario B would not result in different effects from those reported within the residual effects section of the ES chapter. The design of Scenario B would be developed through detailed design, however, the Applicant disagrees that any additional assessment is required for landscape and visual effects, heritage impacts, or residential amenity beyond those included within the ES. The Applicant has submitted updated **2.3 Works Plans – Section C [Revision C] and D [Revision B]** at Deadline 7 to reflect its decision to proceed with Scenario B.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Cumulative impacts on Old Ipswich Road, Wick Lane and Harts Lane There are also serious cumulative impact concerns. The expected Anglian Water pipe between Great Horkesley and Ardleigh Reservoir would pass through the Flying Trade Group land (Old Ipswich Road) towards Dead Lane and the Ardleigh Reservoir pumping station, interacting with the Applicant's project, existing industrial buildings, the SRC mineral extraction site and the proposed asphalt plant on Old Ipswich Road. Together, these schemes would place unacceptable pressure on Ardleigh's sensitive landscape. The combined effects on the Dedham Vale National Landscape, homes, farm businesses, hedgerows, woodland, protected trees and rural setting that have not been adequately considered.	Both the Anglian Water Pipeline and the SRC Minerals extraction sites were considered within the cumulative impact assessment at submission. The Anglian Water Pipeline is listed in **6.17.A2 Environmental Statement Appendix 17.2 – Long List and Short List of Other Developments [APP-283]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** with reference CO3. The development was not progressed to Stages 3 and 4 of the inter-project cumulative effects assessment as the final phase of works were anticipated to be complete by July 2024. There would be no overlap in construction, and post construction the Anglian Water Pipeline project would be underground and land restored, therefore there was not considered to be the potential for any likely significant cumulative effects. SRC Minerals proposal for an asphalt plant and ancillary facilities is also listed in **6.17.A2 Environmental Statement Appendix 17.2 – Long List and Short List of Other Developments [APP-283]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** with reference T34. The project was progressed to Stages 3 and 4 as potential likely significant effects could not be ruled out. A full assessment is presented in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-project Cumulative Effects [APP-284]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]**. During construction significant cumulative effects were identified on Landscape Character Area (LCA) 7A Bromley Heaths and Visual Receptor Area (VRA) C12 Ardleigh due to proximity and agriculture and soils receptors due to the loss of Best and Most Versatile (BMV) agricultural land.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Conclusion and request National Grid's decision to underground the Ardleigh–EACN section is an implicit, and explicit, admission that this landscape is too sensitive for overhead pylons. The Examining Authority should therefore require National Grid to provide a consistent, policy-compliant approach by avoiding pylons in the Ardleigh area. In addition, the	The Applicant notes concerns about the decision to extend underground cables through Dedham Vale National Landscape all the way back to the EACN. As a point of clarification the Applicant has not stated that the landscape is too sensitive for overhead lines. The Applicant refers to its responses to REP6-133 above which address these matters.

Examination Library ID	Name	Matter	NG Response
		Examining Authority should require full and transparent assessment of any changes before any reliance is placed upon them, including confirmed pylon proximity to the Dedham Vale National Landscape, distances to affected homes and heritage assets, updated landscape and visual assessment and a proper cumulative impact assessment alongside other infrastructure and development proposals in the area. Map showing proximity to Dedham Vale National Landscape [see REP6-133]	
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	In Ardleigh and Little Bromley there are understood to be approximately 95 oak trees subject to Tree Preservation Orders, alongside extensive mature hedgerows. National Grid's proposals indicate the removal of approximately 197 mature trees, with partial impacts on a further 154. The full species, age class, condition, ecological function and cumulative impact of these losses remain unclear. Mature oaks, hedgerows, hedge bases, ditches and field margins operate as a connected ecological network. Their loss or fragmentation can reduce habitat continuity and harm nesting, foraging and breeding opportunities for species already under pressure.	Following detailed design, the Applicant has committed to reducing tree/hedgerow loss as far as practicable, see commitment GG14 of **7.2 Outline Code of Construction Practice [Revision G]**. This includes trees that are covered by Tree Preservation Orders. Results from the tree surveys are contained within Annex C of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]** and includes information of tree species, height, stem diameter, crown spread and life stage and presents the impacts identified within the AIA. Potential impacts resulting from hedgerow removal, wildlife corridor severance, habitat loss and overall impacts on ecological networks have been fully assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Habitat loss would be predominantly temporary (during construction only) and will be reinstated on completion of works. Where short-term potential fragmentation effects were identified during construction, mitigation measures have been put in place such as the installation of temporary bat flyways, as presented within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant does not agree that all hedgerows and trees are irreplaceable habitats. Replacement planting would be provided with no lasting effects from habitat fragmentation in the medium to long term, as recorded in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].**
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Planning policy position Mature oak trees and long-established hedgerows are of exceptional ecological importance because they support complex communities built up over decades or centuries. Their habitat structures, continuity, soils, root systems, dead wood, seed banks and associated species cannot be recreated quickly once lost. The Examining Authority should therefore test whether the scheme has genuinely followed the mitigation hierarchy: first avoiding harm, then minimising unavoidable harm, then restoring affected habitats, and only as a last resort compensating for residual impacts. Replacement planting should not be assumed to compensate for the loss of mature trees or established hedgerows within any meaningful timescale.	The Applicant can confirm that the mitigation hierarchy has been applied throughout the design process and will continue to be applied throughout the detailed design phase post consent. Impacts to mature trees, woodlands and hedgerows have been avoided or minimised wherever practicable. Where impacts are unavoidable, appropriate mitigation has been proposed and agreed with relevant stakeholders. Compensation is only proposed as a last resort in line with the mitigation hierarchy. While the Applicant acknowledges there is a time lag for replacement trees and hedgerows to reach maturity, this has been addressed with the additional planting proposed in the form of the Projects 10% Biodiversity Net Gain and 3:1 tree planting commitment. The Applicant recognises that veteran trees and ancient woodland are irreplaceable habitat, which take decades/centuries to establish. The Applicant has demonstrated through the design change control and on-going detailed design that the hierarchy to avoid / minimise impacts to ancient woodland and veteran trees has been applied. Appendix B of **7.4 Outline Landscape and Ecological Management Plan [Revision D]** details the Applicants approach to Ancient Woodland and Veteran trees.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Evidence and safeguards requested National Grid should provide a transparent schedule of all affected trees and hedgerows in Ardleigh, Little Bromley and the wider route, identifying species, age class, condition, Tree Preservation Order status, ecological value, nature of impact and whether each	Paragraph 5.11.27 of NPS EN-1 (2024) states that '*Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and*

Examination Library ID	Name	Matter	NG Response
		loss is temporary, partial or permanent. National Grid should also explain, site by site, how the mitigation hierarchy has been applied and why lower-impact alternatives have not been selected where they would avoid or reduce harm to mature trees, hedgerows, ecological networks and rural landscape character. The following safeguards are requested before any consent is granted: • A full alternatives assessment, including offshore coordination, brownfield or previously developed land, alternative routeing, adjusted working areas and existing infrastructure corridors. • Rigorous application of the mitigation hierarchy, with avoidance of harm to TPO trees, mature oaks, veteran or near-veteran trees, important hedgerows, hedge banks and root protection areas. • Clear arboricultural and ecological justification for every mature tree removal or significant pruning. • Assessment of hedgerow impacts by ecological function, connectivity and fragmentation, not only by length removed. • Recognition that mature trees and established hedgerows are effectively irreplaceable where their ecological functions cannot be recreated within a meaningful timescale, with any residual compensation local, additional, measurable, enforceable and secured for long-term management. The Examining Authority is respectfully asked to give significant weight to the loss and fragmentation of mature trees and hedgerows, require fuller evidence where impacts and alternatives remain uncertain, and secure robust avoidance, minimisation, restoration, compensation and monitoring requirements before any consent is granted.	*improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured'* In line with Appendix J of the scoping report **6.19 Scoping Report - including Appendices B to K [APP-296]**, the Applicant has provided transparency on the impacts to trees within Appendix 13.6 of **6.13.A6 Environmental Statement [Revision B]**. The Applicant has committed to reducing impacts to trees during detailed design, see commitment GG14 of **7.2 Outline Code of Construction Practice [Revision G].** Through commitment LV05 of **7.2 Outline Code of Construction Practice [Revision G]** the Applicant has demonstrated that works within root protection areas will be addressed within Arboricultural Method Statements with works carried out under arboricultural supervision and tree protection measures applied as per BS 5837:2012. With regard to the comment regarding the need to give weight to the loss of trees and hedgerows in any decision, Paragraph 4.1.5 of EN-1 provides: '*4.1.5 In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:* • *its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits* • *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'* The critical national priority ('CNP') policies (detailed below) **contain a further presumption** for CNP infrastructure which address how residual effects remaining after the application of the mitigation hierarchy are to be considered in the planning balance. Paragraph 3.3.63 of EN-1 confirms (emphasis added): '3.3.63 …***the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts*** *not capable of being addressed by application of the mitigation hierarchy.* ***Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.***' With regard to potential impacts resulting from hedgerow removal, wildlife corridor severance, habitat loss and overall impacts on ecological networks have been fully assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Habitat loss would be predominantly temporary (during construction only) and will be reinstated on completion of works. Where short-term potential fragmentation effects were identified during construction, mitigation measures have been put in place such as the installation of temporary bat flyways, as presented within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant does not agree that all hedgerows and trees are irreplaceable habitats. Replacement planting would be provided with no lasting effects from habitat fragmentation in the medium to long term, as recorded in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].**
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Response to the Applicant's deadline 5 submissions relating to visualisations ALBA would like to highlight the following points in relation to the Applicant's [REP5 194] submission: *[Applicant note: numbering added to bullets to aid the reader]* • *[1]* The following statement is very concerning: "The conclusions of the Landscape and Visual Impact	The Applicant acknowledges the comments provided by Ardleigh Parish Council and Little Bromley Parish Council and has reviewed their content. [1]: The visual assessment has been undertaken based on consideration of views experienced from a number of Visual Receptor Areas (VRAs) and does not rely solely on viewpoints. The approach to the identification of VRAs is set out in paragraph 13.4.48 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B].** The assessment of visual effects on each VRA is presented in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [Revision B].**

		Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] or the Historic Environment assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] will not change as a result of adding new illustrated viewpoints". • [2] These are viewpoints that the Applicant has not previously assessed, despite earlier requests from ALBA. It is therefore premature to state that the assessments would not change. • [3] Five of these requests date back to the 2024 statutory consultation – please refer to [REP4-319] for details. • [4] Of the 11 viewpoints requested by ALBA, the Applicant has stated that it will only be producing visualisations for 2 of these (Bounds Farm, Hungerdown Lane and at the intersection between PRoW Ardleigh 5 and PRoW Ardleigh 7/Green Lane). • [5] In addition, the Applicant has committed to producing the new visualisations for deadline 6 instead of deadline 5 as requested by the ExA. • [6] The Applicant acknowledges "the effect on visual receptors would be major and significant" for 5 of the 9 viewpoints that were dismissed. ALBA considers this level of harm to be sufficient justification alone for including viewpoints relating to these visual receptors. • [7] ALBA strongly disagrees with the following statement, which the Applicant has attached to two of the requested viewpoints: "It was agreed with heritage stakeholders that a VP from/across the 'Crop Mark Site S of Ardleigh' (1002146) scheduled monument would not contribute to the conclusion of assessment as the archaeology has no above ground remains and therefore this visual element of its setting does not provide a significant contribution to its value". The setting does provide a significant contribution to its value, as ALBA has outlined in previous submissions. • [8] In relation to requested "Viewpoint A - From the South of the A137 Ardleigh Conservation Area (CA26)" the Applicant states: "The location as shown on the image is not one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan (Place Services 2025). It is close to VP 3.11 which is informed by one of the identified key views in the	[2]: The assessment of effects within VRAs is cross referenced to and supplemented by 206 viewpoint assessments, many of which are supported by photomontages and wirelines. The number of viewpoints assessed is considered to be proportionate and appropriate in relation to the scale of the Project. The assessment is based on first-hand observations during site visits and not on viewpoints and visualisations alone. [3, 4 and 6]: The viewpoints requested by ALBA are all located in proximity to the Project, where very close views towards the Project would be available. Effects from these locations are judged to be major and significant (adverse) as set out in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]. The production of visualisations would not change these professional judgements. [5]: Notwithstanding the above comment, the Applicant provided photomontages from Bounds Farm, Hungerdown Lane and at the intersection between PRoW Ardleigh 5 and PRoW Ardleigh 7/Green Lane at Deadline 6 in **8.4.12.4 Photomontages - Bounds Farm, Hungerdown Lane and at the intersection between PRoW Ardleigh 5 and PRoW Ardleigh 7/Green [REP6-113]**. [6] Regarding the concern that additional visualisations would not change the Historic Environment assessment, the Applicant has previously addressed this matter in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]** and **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. As set out in these submissions, the Applicant reviewed the additional visualisations provided at Deadline 6 and confirmed that they do not alter the assessment conclusions. The Applicant further explained that, for the vast majority of heritage assets assessed for the Project, the nature and extent of their settings are not so clearly defined that movement within the Limits of Deviation would alter how pylons interact with those settings or make an appreciable difference to the assessment conclusions. Also, the Applicant has explained that the Historic Environment assessment was informed by a combination of site visits, setting assessments, aerial imagery, street-view imagery and viewpoint analysis, rather than individual illustrated viewpoints alone. The Applicant also notes that this approach was agreed with Historic England. The Applicant remains satisfied that the conclusions of the Historic Environment assessment remain unchanged. [7] Regarding Crop Mark Site S of Ardleigh' scheduled monument (1002146), the setting of this asset has been assessed within **6.11.A1 Historic Environment Baseline Report [Revision C]** and the Applicant has concluded that the setting contributes moderately to its value. This assessment has been informed by a combination of site visits, aerial imagery, street-view imagery and this approach was agreed with Historic England. Therefore, the Applicant is satisfied with the statement in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].** [8 - 12] Regarding Viewpoint A, the Applicant does not have any further submissions to make and confirms its previous submission **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194],** page 46 on this question. The Applicant considers that the viewpoints that have been produced are suitable to inform the assessment of the conservation area, given that the assessment has also been informed by a combination of site visits, aerial imagery, street-view imagery and this approach was agreed with Historic England.

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		conservation area appraisal and has informed the assessment of the conservation area". • • [9] Both statements are incorrect, as outlined below:(i) Viewpoint A does in fact coincide with one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan. The map showing the location of Viewpoint A was provided in section 1.2. of "Appendix A: Viewpoint Maps and Images" in [REP4-319]. The corresponding map from the Ardleigh Conservation Area Character Appraisal and Management Plan1 was included on page 14 of the [REP4-319] main document. (ii) The location, orientation and views from Viewpoint A are very different to VP 3.11.and therefore warrant an additional visualisation. • [10] To help clarify the matter, an annotated copy of the "Map showing key views within the Conservation Area" from the Ardleigh Conservation Area Character Appraisal and Management Plan is included in this document. Labels have been added to show the viewpoint that is close to the Applicant's "VP 3.11" and the viewpoint that is close to ALBA's "Viewpoint A". • [11] "Viewpoint A" represents one of the key views in the Ardleigh Conservation Area Character Appraisal and Management Plan. As it is also one of only two key external views identified in the conservation area plan and, as there would be extensive visibility of the proposed development from this viewpoint, the views from here should have been considered in the assessment of harm to the Ardleigh Conservation Area. The Applicant only refers to the other external view, which is the one close to Applicant's VP 3.11. • [12] Ardleigh PC highlighted the significance of the view from this second viewpoint (now known as "Viewpoint A") in the Historic Environment report submitted for the Norwich to Tilbury Statutory Consultation in July 20242, but, as illustrated here, this was not accepted by the Applicant. • [13] The Applicant refers to the vegetation removal plans as an alternative to the declined visualisation request for Bentley Road (PAR30), Little Bromley. ALBA does not consider that the 2D plans adequately convey the impact of the proposed vegetation removal. • [14] Two of the declined viewpoint requests relate to the route alignment changes introduced during the 2025 Targeted Consultation. As no visualisations	[13]: The Applicant has responded to this point in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].** [14] : With regard to the route alignment changes during the 2025 Targeted Consultation, further information is available from PDF page 377 of **5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-077].** [15] Regarding the existing visualisations, including those of Grade II* St Mary's Church, Ardleigh (NHLE 1112060), the Applicant considers that the images provide the level of understanding required to assess the asset and its setting. As set out above the assessment has also been informed by site visits, aerial photography and street-view imagery, consistent with the approach agreed with Historic England. The Applicant is therefore satisfied that the existing visualisations are sufficient to inform the assessment.

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		relating to this change were supplied at the time of the consultation, or in response to requests made when the changes were confirmed, it remains to be the case that no visualisations in any form have been supplied to reflect these changes. Please refer to [REP4-319] for further details of the previous requests. • • [15] Additionally, the Applicant has not addressed points raised by ALBA in [REP4 319] in relation to the quality of the existing visualisations, such as the Grade II* St Mary's Church, Ardleigh (1112060) being obscured by a tree in the image from Viewpoint 3.31 *[See REP6-133 for image]*	
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	3D visualisation tool The Applicant supplied screenshots from the 3D visualisation tool in Appendix H of "8.9.2 Applicant's Response to Second Written Questions" [REP5-211]. The new images were naturally of higher quality than the photographs taken of a computer screen by residents during the 2024 statutory consultation. However, it would have been helpful if the Applicant had also supplied images from the 3D visualisation tool for the locations where it has refused to grant requests for photomontage visualisations, and if the model had been updated to reflect the changes relating to the 2025 targeted consultation.	The Applicant provided appropriate screenshots in response to Written Question LV 2.19 as requested by the ExA, as set out in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211].** The Applicant acknowledges that a 3D visualisation tool was provided at the 2024 public consultation events, despite there being no requirement to provide such a tool to assist consultation. The 3D visualisation tool provided a visualisation of the proposed pylon locations modelled on the 2024 statutory consultation design and was an illustrative tool designed to be viewed in conjunction with other published consultation materials. For the 2025 targeted consultation public events, the tool was updated in three locations to reflect proposed changes (the two locations where the Applicant consulted on the use of low height pylons and the proposed Tilbury North substation). For the periods when the 3D visualisation tool reflected the latest proposals, the Applicant provided screenshots from the 3D visualisation tool by email upon request. The design shown on the model is therefore not in all respects the same as the design presented in the application. The Applicant responded to the request for additional visualisations requested by the Parish Council under hearing action point 32 of **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194],** in which the Applicant explained the effects and signposted to relevant information for some of the requested visualisations, and provided additional visualisations for two requested locations at Deadline 6 in **8.4.12.4 Photomontages - Bounds Farm, Hungerdown Lane and at the intersection between PRoW Ardleigh 5 and PRoW Ardleigh 7/Green [REP6-113].** As stated in REP5-194, the Applicant considers that the number of viewpoints assessed in the LVIA (206 across the Project as a whole) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Limit of Deviation visualisation The Applicant provided Limit of Deviation (LoD) Visualisations for Viewpoint HE25 in Ardleigh in response to ISH2 Action Point 25. The relevant document is "8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 3" [REP5-197]. The visualisations for this viewpoint are on pages 43 to 49 (out of 49) of the electronic version. When considered together, the images on pages 46 and 49 of [REP5-197] provide a 180 degree view at the Limit of Deviation. *[The IP provides copies of the images]*	The Applicant has reviewed the listed buildings within the Ardleigh conservation area in response to the IPs comment. These assets were scoped out of assessment as set out in **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**, using the methodology agreed with historic environment stakeholders. The agreed methodology includes a 250m study area for non-designated heritage assets, and most of Ardleigh is outside this study area which is why non-designated buildings in the village were not assessed. The Applicant is satisfied that the settings of the assets do not extend to the Order Limits and that the settings are primarily informed by the local streetscape. As set out previously the historic environment assessment was informed by site visits, setting assessments, aerial imagery, street-view imagery and visualisations. All relevant visualisations were considered in the assessment, not only those categorised as historic environment viewpoints. The 'HE' viewpoints are those that inform only the historic environment assessment, whereas the landscape and visual

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		The images show that overhead lines would be very visible for most of this 180-degree view. Some of the pylons around the village are angle pylons which have a significantly higher visual impact, and these will come into view depending on the exact viewing position. Noting that this viewpoint, HE25, is in the village centre, ALBA considers that the Applicant should re-assess the impact of the proposed infrastructure on the village. This includes re-assessment of the many heritage assets located in the centre, noting that the Applicant scoped most of these out of the assessment. As outlined in previous submissions, the Applicant's drawing "Figure 11.2- Historic Environment - Designated Heritage Assets Assessed in the ES Chapter (now at Revision C)" [REP4-145] only shows one listed building in the Ardleigh Conservation Area, which is the Grade II* St Mary's Church, Ardleigh (1112060). There are 17 listed buildings in the conservation area and many important non-designated heritage assets. There is therefore a high aggregative value. An overview of the impact on the historic environment is provided in previous submission "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh" [AS-065]. As has been raised previously, considering the rich heritage of the village, it is not considered sufficient for ALBA to only have one Historic Environment viewpoint.	viewpoints have informed both the landscape and visual and, where relevant, the historic environment assessment.
REP6-133	Ardleigh Parish Council and Little Bromley Parish Council	Conclusions The Applicant's response to the requests for additional viewpoints is very disappointing, particularly considering the very high degree of harm the proposal would cause to ALBA. Issues with the previous visualisations are outlined in ALBA submission [REP4-319]. The response does not address the needs and concerns of the community. Many residents are still not aware of the full impact. It also deprives the Examination of important information when there is only 5 weeks remaining until the end of the 6 month process. As has been the case throughout, the Applicant has not properly considered the knowledge of those who live in the community. Detailed information has been supplied by ALBA at all stages of the process from people who know and understand the area and would have to live with proposals. The Applicant uses the word "proportionate" to justify its decision making in relation to the requests for additional visualisations. Proportionality should apply to the specific situation and the harm caused. The route of the proposed infrastructure in ALBA is particularly complex and hard to visualise. There is also no doubt that the impact on ALBA of the Norwich to Tilbury project and the associated proposals would be	The Applicant acknowledges the concluding summary provided and has responded to these points as raised above.

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		profound. The images from the 3D visualisation tool demonstrate a much higher level of harm than is apparent from the photomontages supplied by the Applicant. These images represent a subset of those listed in ALBA's visualisation requests. In light of the Applicant's decision to not supply photomontages for these viewpoints, the ExA is respectfully referred to the images from the 3D visualisation tool in Applicant's document [REP5-211]3 Appendix H, LV 2.19 page 396 to 414 (out of 429) and the corresponding baseline images supplied by ALBA residents in ALBA submission [REP4-319]4 (the main report and the Appendices). As several important viewpoints have never been assessed, the Applicant's landscape and heritage conclusions need to be treated with appropriate caution.	
REP6-134	ARU Writtle	Please refer to Appendix F of this document.	Please refer to Appendix F of this document.
REP6-135	Babergh District Council and Mid Suffolk District Council	Comments on **REP5-139 Outline Code of Construction Practice (and REP4-169), 1.2.5 and 7.2 and Outline Code of Construction Practice Appendix E - Community Engagement and Public Information**: 1.2.5 of the oCoCP states the objective of the document to set out the approach to compliance monitoring, reporting and remediation. Section 7.2 goes on to state that monitoring will ensure compliance with the CoCP and other plans. Appendix E of the oCoCP sets out a procedure for complaints to the Applicant by communities. These proposals appear to refer to the Applicant's internal compliance monitoring process only and does not provide for reporting, liaison and agreement of resolution with the respective local planning authorities as enforcing authorities. Part 8 of the Planning Act 2008 provides for enforcement of DCO development and Government states that "enforcement is important for maintaining public confidence in the planning system" (House of Commons Library, 2024). Effective enforcement protects communities and the environment, maintaining public trust, in the planning system. Further, noting that the Applicant considers the responsibility for lawful compliance of the development to lie jointly with themselves and the respective local authorities (The Applicant's Draft Discharge of Requirements Strategy, 2026), BMSDC consider it critical for an appropriate compliance monitoring, reporting and enforcement process to be agreed by the Applicant and enforcing authorities. An appropriate strategy will ensure transparency of process, build trust between stakeholders and enable	As explained in ID 9.8 and 9.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, the responsibility for construction management, compliance and day-to-day control rests with the Applicant and its contractors. This is established through **7.2 Outline Code of Construction Practice (Revision G)**, secured by Requirement 4 of **3.1 Draft DCO [Revision G]**. The Outline Code of Construction Practice provides the overarching framework for construction management and is supported by the suite of management plans, monitoring and reporting mechanisms secured through the DCO Requirements. The Applicant considers that the current framework provided within the application documents and the Draft DCO provide sufficient provision for both the Applicant and host authorities to carry out their duties to ensure lawful delivery of the Project. The Applicant notes that the Planning Act 2008 already provides a robust enforcement framework in relation to compliance with a Development Consent Order. Section 161 makes it an offence, without reasonable excuse, to carry out development in breach of the terms of a Development Consent Order or otherwise fail to comply with its requirements. In addition, where a local planning authority has reasonable grounds to suspect such a breach, it has powers to investigate under section 163 and may apply to the Court for an injunction under section 171 to restrain any activity that constitutes an offence under sections 160 or 161. Accordingly, the undertaker has a continuing legal obligation to ensure that the authorised development is implemented in accordance with the DCO and the consented scheme, and local planning authorities already have significant enforcement powers where they consider that a breach has occurred. This enables local authorities, in their role as enforcing authorities under the Planning Act 2008, to review compliance, investigate potential issues, respond to complaints and undertake enforcement action where necessary, while maintaining the Applicant's responsibility for monitoring, record-keeping and day-to-day compliance management. The Applicant therefore considers that the Outline Code of Construction Practice provides an appropriate and proportionate framework that minimises the risk of non-compliance through applicant-led controls, with enforcement retained as an appropriate regulatory backstop.

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		timely and responsive approach to resolution of matters arising, reducing the likelihood of delay to the delivery of the project as a result of enforcement investigation and action. As a minimum, BMSDC would expect to see the strategy comprise the following: i. A commitment to submit regular compliance monitoring reporting to the enforcing authorities by the Applicant. ii. Clear details of any non-compliance identified by the Applicant to include precise nature, location, and approved vs as built plans and documents. iii. Intended steps for regularisation of the non-compliance including a timetable and process for approval / agreement of such action, to be agreed with the enforcing authorities iv. A clear audit trail of documents and plans the Applicant is relying on at any given time, to be a 'living library' allowing for updated and amended documents, as may be approved, to regularise non-compliance on an ongoing basis v. A commitment to regular dialogue with the enforcing authorities regarding the investigation and response to 3rd party reported non-compliance vi. A commitment to enable site inspection by the enforcing authorities as necessary The strategy, as may be agreed, should apply to compliance of all matters, across the whole project. The following statements in other management documents are noted: OLEMP: 11.3.4 Further detail on site checks and reporting will be provided by the Main Works Contractor(s) in the Final LEMP.	The Applicant does not consider that regular compliance monitoring reporting would be necessary. Compliance monitoring is undertaken through a combination of daily, weekly and monthly inspections, audits, checks and reporting processes carried out by the Applicant and its delivery partners. The volume of information generated is substantial and much of it relates to routine assurance activities rather than matters requiring regulatory intervention. The routine provision of all such information would create a significant administrative burden for both the Applicant and host authorities, requiring considerable resource to collate, review and interpret, whilst providing limited additional regulatory benefit. The Applicant further notes that the cost of any additional reporting and oversight requirements would ultimately be borne by consumers. Should local authorities seek funding to support review or enforcement activities associated with receiving and monitoring such information, (a question raised by Tendring District Council in its Local Impact Report **[REP1-182]**), the Applicant would be required to justify those costs through its regulatory arrangements with Ofgem. In the Applicant's view, this would represent an exceptional approach which has not been demonstrated to be necessary in this case. Section 7.2 of the **Outline Code of Construction Practice [Revision G]** requires monitoring data to be recorded and retained by the Applicant and its contractors as part of the Project's environmental management system. Where relevant, this information is to be made available to the relevant local planning authority on request, rather than through routine reporting. Where routine reporting is required, this is secured through Table 6.1 of the **7.2 Outline Code of Construction Practice [Revision G]**. The Applicant does not consider it necessary or appropriate to seek to prescribe or duplicate those statutory arrangements through an additional strategy or reporting process. Notwithstanding the above, the Applicant is committed to maintaining a transparent and collaborative relationship with host authorities throughout the construction period. Regular project governance meetings and subject-specific engagement forums provide ongoing opportunities to discuss compliance matters, emerging issues and lessons learned.
REP6-135	Babergh District Council and Mid Suffolk District Council	Comments on **REP5-166 Design Approach for Site Specific Infrastructure (DASSI)**: BMSDC note and welcome the commitments at 6.2.20, 6.2.38 and 6.2.40 to consult with / invite the local planning authorities to participate in the design review of relevant elements of the development. BMSDC look forward to working with the applicant to develop and implement the DASSI	The Applicant welcomes this feedback from Babergh District Council and Mid Suffolk District Council.
REP6-143	Burstall Parish Council	The Areas of Particular Importance to Biodiversity (APIB) and Areas which Could Become Important for Biodiversity (ACB), as defined in the Local Nature Recovery Strategy (LNRS) copy below, encircle the north, east and south of the Bramford Substation, as well as the north and south of Burstall, including the	The Applicant will consider the Suffolk LNRSs as part of the off-site BNG selection process, where sites are available, and appropriate to the Project. This off-site 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. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.

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		Belstead Brook Corridor. These are significant areas and it is apparent that neither the Norwich to Tilbury project nor the Brunfort BESS have taken these into account. We are concerned that both projects are planning damaging developments which will have a significant negative and irreversible impact on biodiversity and the natural setting within these boundaries. In contrast, Burstall Parish Council is looking to work with landowners to increase and enhance biodiversity in these areas and is obtaining funding, including through existing S106 money, to ensure these enhancements are undertaken. *[See REP6-143 for image provided of Suffolk Local Habitat Map]*	In addition, the seven Environmental Areas around the permanent assets (i.e. Substations and Cable Sealing End (CSE) Compounds) also offer opportunities to align with the LNRS's. Please refer to BIO 1.3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-075]** for further details.
REP6-143	Burstall Parish Council	Security & Resilience BPC remains concerned by the Applicant's continued evasion of scrutiny regarding security standards, especially given the hurdle which is currently preventing the ExA from legally recommending consent of their project.	The Applicant notes that a number of the matters raised in relation to security, resilience and operational continuity have been addressed in previous submissions during the Examination. The comments below provide further clarification and should be read alongside those earlier responses. The Applicant also notes that security and resilience are not considered solely through compliance with a single standard or policy. Rather, the project has been developed having regard to the wider legislative, regulatory and engineering framework applicable to Critical National Infrastructure, including the relevant provisions of NPS EN-1, the NETS Security and Quality of Supply Standard (NETS SQSS) where applicable to network planning, established government guidance, and the Applicant's established engineering assurance, governance and contractor management processes which implement those requirements throughout the design, construction and operational lifecycle. The Applicant notes the comments made regarding the level of scrutiny applied to security matters but does not accept the characterisation that security considerations have not been adequately addressed during the Examination. Security, resilience and operational continuity have been addressed through the Application and subsequent Examination responses, including responses to the Examining Authority's questions. The Applicant remains satisfied that the project has been developed in accordance with the relevant provisions of NPS EN-1, including Section 4.16, and that appropriate consideration has been given to security matters throughout the design and development of the Project.
REP6-143	Burstall Parish Council	Security & Resilience NGET Openly Avoiding ExA Requests for Information: Despite the ExA twice requesting details regarding security compliance NGET continue to withhold the information. BPC notes that zero Redacted or Confidential documents have been uploaded to the Examination Library on the topic of security. An Applicant cannot simultaneously claim a project is safe while withholding the evidence required by law to prove that safety. If a major developer can openly ignore two direct requests from the ExA on the topic of public safety, then the DCO and EIA processes are undermined.	The Applicant notes the comments made regarding the information provided during the Examination but does not accept the characterisation that it has failed to respond to the Examining Authority's requests. Information has been provided throughout the Examination at a level appropriate for the public domain, including previous responses relating to security and resilience. As previously explained, detailed information relating to the security of Critical National Infrastructure cannot appropriately be placed in the public domain, consistent with paragraphs 4.16.7 to 4.16.9 of NPS EN-1 (2024).

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REP6-143	Burstall Parish Council	Security & Resilience Misleading Claim about NETS SQSS: Throughout application documents and responses to deadlines, NGET claim the project design complies with NETS SQSS obligations. Though no evidence to demonstrate this compliance has ever been submitted - even in confidential format - to this Examination. BPC have raised concerns that SQSS is a minimum requirement of transmission operators, and that other standard requirements of CNI have not been considered by NGET. In response to our concerns, NGET asserted that the SQSS standard is not a minimum requirement [SS1.1]. We are bewildered by this claim which misleads the Examination. At paragraph 1.6 of the SQSS it states"The criteria presented in this Standard represent the minimum requirements for the planning and operation of the national electricity transmission system." This is the same wording in v1.10 updated prior to the Examination started, as it is in the latest version 1.12 updated on 29th May 2026.	The Applicant notes the comments regarding the role of the NETS Security and Quality of Supply Standard (SQSS) but does not accept that its previous responses have suggested that SQSS alone addresses all security and resilience considerations. The Applicant recognises that SQSS establishes the minimum technical requirements for planning and operating the National Electricity Transmission System. As previously explained, the Proposed Development has been developed within a wider framework of engineering, operational, regulatory and security governance applicable to Critical National Infrastructure, of which SQSS forms one component.
REP6-143	Burstall Parish Council	Security & Resilience Lack of Transparency on other Standards: Throughout the Applicant's responses, NGET have also claimed that a range of security standards and policies have been used to develop the proposal. SS1.1 Response: "With regards to MAD scenarios, these are already considered within the established regulatory and policy frameworks applicable to critical national infrastructure (CNI). These processes include appropriate and relevant risk assessments and operational processes to ensure an operable and resilient network." Deadline 5 REP5-192: "Substations are designed, operated and maintained in accordance with established industry standards and resilience requirements applicable to critical national priority infrastructure. Appropriate emergency response and incident management procedures are developed in consultation with the relevant emergency services and authorities, including arrangements to maintain access to operational infrastructure during both routine and emergency situations." SS2.1 Response: "Whilst compliance with the Security and Quality of Supply Standard (SQSS) forms an important component of network resilience, the Applicant does not rely solely on compliance with the SQSS when considering resilience and operational continuity.... Security considerations have been taken into account throughout the development of the Project, including through the application of established security design principles, consideration of physical and operational security	Safety, security and resilience is a top priority for National Grid. The electricity transmission network is one of the most reliable in the world and we have security measures in place across all operations which follow the guidance set out by NESO, government, and the security agencies. National Grid engages with the National Protective Security Authority (NPSA) to understand the controls required at all National Infrastructure sites. National Grid produces technical specifications and site-specific operational requirements that meet these criteria and site-specific designs, aligned to any local threat and impact. We follow the NPSA guidance (see Appendix H of this document) and DESNZ process to ensure that we are protecting sites in line with their expectations against any threat. National Grid engages independent specialists through the Register of Security Engineers and Specialists (RSES), as an independent auditor to ensure designs meet such specified criteria. We cannot go into specifics for each site; however, these controls ensure a proportionate approach to security at each site. This process that sits outside the DCO consenting regime provides the necessary assurance and validation of National Grid plans and procedures to security threats. Proportionate controls for current and future threats, in line with DESNZ expectations, following NPSA's advice and guidance is therefore in place. Major accident and disaster risks including security threats are managed throughout the lifecycle of the Project through a comprehensive framework of statutory duties, industry standards and National Grid management systems. These requirements apply from project development, through construction and commissioning, and into the operational life of the asset, ensuring that hazards and security risks are identified, assessed and controlled using recognised good practice and proportionate risk management measures. The carrying out of risk assessments that are developed, maintained, tested and implemented in accordance with statutory requirements and established National Grid procedures are not appropriate for publication owing to the sensitivity of information relating to the security and resilience of the national electricity transmission network. The requirements apply from project development, through construction and commissioning, and into the operational life of the asset, ensuring that security risks are identified, assessed and controlled using recognised good practice and proportionate risk management measures. A key stage is the

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		design principles, consideration of physical and operational resilience, and engagement with relevant security stakeholders where appropriate." Though, NGET never mention what this mysterious collection of standards are, repeatedly reciting confidentiality reasons. It is impossible for the ExA to verify the projects' compliance against unknown standards, and without a shred of evidence to support the claims. The Applicant's claims are further undermined by the absence of any indication the relevant regional or local officers are aware of such "established security design principles, consideration of physical and operational resilience." While from a lay perspective we would not expect to be informed of the details, it would be reasonable and appropriate to be notified that they exist. It would also be not just reasonable but essential to be reliably informed they have been tested and were fully understood at all relevant levels. The absence of any evidence that this is the case makes the Applicant's defence implausible at best.	handover point once a substation is commissioned to the operations team at which point the asset management systems; and the operational assurance and compliance audits come into effect. NPS EN-1 (2024) does not specify evidence is required. Paragraph 4.16.7 states that *'**the applicant should only include sufficient information in the application as is necessary** to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application'* (our emphasis). The Applicant considers we have provided sufficient information that explains the wider processes and procedures in place to safeguard existing and proposed new assets from security threats. It is a general principle that the planning system should not duplicate controls exercised by other mechanisms.
REP6-143	Burstall Parish Council	Security & Resilience Environmental Information Requests Because the Applicant refuses to satisfy the Inspectors' questions, BPC has submitted formal requests under the Environmental Information Regulations 2004 to several public authorities. In SS2.1 NGET states "security considerations for the Project have been undertaken in accordance with established government guidance and through engagement processes with relevant security and advisory bodies, including the National Protective Security Authority and associated stakeholders where appropriate." The NPSA is the only authority named by NGET as a security consultee. However, we could not submit an EIR request to the NPSA because they are exempt from requests. However, as a branch of MI5 who do consider EIR requests on a case-by-case basis, we sent a request to MI5 instead. We have also sent requests to Ofgem, NESO, and the Home Office. Due to the security nature of the topic our requests are limited in their scope. They do not seek to obtain documentation or any substantive detail of consultations. Instead they strictly seek to verify that they happened. BPC will update the ExA as and when we receive responses.	The Applicant notes Burstall Parish Council's comments regarding Environmental Information Requests submitted to third parties. The Applicant is not able to comment on Environmental Information Requests made by third parties to other organisations, nor on how those organisations may respond.
REP6-143	Burstall Parish Council	Traffic -Burstall Lane/A1071 Diversion In document REP4-298 NGET state, "The Applicant notes the request for swept path analysis at the junctions on the proposed diversion route. The	The Applicant notes Burstall Parish Council's comments and provided a response to this request in **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]**.

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		appropriate assessments, including swept path analysis where necessary, will be undertaken by the Main Works Contractor to confirm the diversion is suitable as part of the development of the traffic management plans." A key principle of the DCO process is that environmental impacts must be assessed before determination. By proposing a diversion route that is of a lower standard than the closed road, and refusing to provide a swept path analysis that demonstrates with verifiable evidence it is still suitable, NGET are asking the ExA to blindly grant consent for a diversion route without knowing the potential damage it would cause. Official diversion routes must be capable of safely accommodating the traffic that will be using it. If an HGV cannot physically make the turnings without causing damage, and this damage is not acknowledged in the ES, then the ES remains incomplete. Local experience with "lost" HGVs proves that large vehicles cannot physically make these turns, resulting in gridlock, verge and habitat damage, and even damage to road signage. See photo below which is the junction between Burstall Lane and the village highlighting HGV damage due to insufficient design: *[IP attaches image of damaged temporary road sign* NGET state the alternative would be a 40 mile diversion, but also claim a 40 mile diversion is unacceptable for traffic. This may be the case for cars, who could still use the currently proposed diversion. But a 40 mile diversion is common for HGVs in the countryside. NGET could split the diversion. Furthermore, trying to force through an official diversion at the Determination stage, that turns out to be physically unviable when discharging conditions, puts an impossible burden on the Local Highway Authority. They are left defending a refusal for an unsuitable diversion that should have been resolved before determination. Furthermore, deferring this assessment risks delays later on when NGET need to make a Non-Material Amendment request to the DCO to change the consented diversion. It is in everyones' interest to have the swept path analysis now. We ask again for the swept path analysis now, and failing that, we ask for a split diversion where cars can use the currently proposed diversion and HGVs use the longer 40 mile diversion.]	The detail of the diversion routes proposed within the DCO is to be confirmed as part of the detailed design, in consultation with the relevant highway authority(ies). This is a standard approach on construction projects and recognises that proposed diversion routes are subject to change for a whole variety of reasons ranging from: • Planned closure dates and time of day, • Required closure period, and if a closure is even required or could traffic management be suitable instead. • Detailed design on the proposed traffic management • Detailed design on the proposed overhead alignment and proposed method of construction. • Phasing of other road closures/works or events in the area which may dictate the appropriate diversion route. This is a common and standard approach to agreeing diversions and the applicant has committed to following the LHA's Permit Scheme for agreeing traffic management plans (drawings). These plans will include the swept path analysis at junctions as raised by Burstall Parish Council, as well as any signage or traffic management measures required to manage vehicle speeds and movements during the closure. The traffic management plans will be submitted to the Local Highway Authority for approval as part of the Permit Scheme. In addition, the DCO will, if granted, include the ability to seek consent from the relevant highway authority(ies) for alternative diversion routes, should the need arise.
REP6-143	Burstall Parish Council	Traffic - 30mph Road Limit on Burstall Road We note that in response to our request for a temporary road limit along Burstall Road, NGET claim the diversion will only be for a short time overnight. This is all the more reason for a temporary 30mph limit. Night time	The Applicant provided a response to this request in **8.8.1 Applicant's Comments on Written Representations [REP2-029].** The Applicant is not currently proposing a speed reduction along Burstall Road as there are no highway works proposed and the Applicant does not agree that a speed reduction order is necessary or appropriate. Due to the short duration, temporary nature of the road closures, and following typical temporary road closure procedures, TROs are not being applied for on

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		darkness greatly reduces the visibility of road conditions for drivers, thus making the road even more dangerous for increased road traffic. This is not a road through an urban area lined with street lights. It is a narrow windy country road of varying widths. Relying on "standard procedures" for a highly non-standard diversion is a failure of NGET's duty of care to protect road users during disruption caused by their project, and yet another public safety issue.	the diversion routes. However, the Main Works Contractor will engage with the Local Highway Authority on the traffic management requirements including potential speed management as part of the Permit Scheme.
REP6-143	Burstall Parish Council	Noise Impacted by the cumulative effect of multiple concentrated infrastructure projects, resident of Burstall know what an impact construction and operational noise can have. In the last week, BPC have reported 2 noisy construction events both out of hours, one at 0900hrs on a Sunday and the other at 0730hrs on a weekday. Both we have been told were due to the Bramford to Twinstead project and have an enormously negative impacts of the quality of life for residents in this quiet rural area. We would urge the ExA to ensure that all out of hours work is constrained to absolute emergencies and that the permission for emergency out of hours work is cleared at the highest level. For those living along the pylon route, the impact of the construction during working hours is bad enough, without the addition of unnecessary out of hours work. In line with The Planning Act 2008, we urge the ExA to ensure that where cumulative impacts are most heavily felt, such as at the Bramford Substation, where they are likely to be significant, special measures and conditions must be applied. We would ask for the full range of controls to be approved, including: limiting construction hours; noise and vibration limits; active monitoring; efficient complaint procedures; regular use of quieter plant; restrictions on particularly noisy activities; advance approval of construction noise management plans; and, clear operational noise limits at identified sensitive receptors. As well as construction noise, we would also ask ExA to be mindful of the applicant's plans for mitigating the concentration of operational noise at the Bramford Substation. We assess that cumulative operational noise will have an impact on Burstall, the amenity of the countryside and tranquil areas, such as Elms Grove, the enjoyment of quiet rural areas, wildlife, protected species and the setting of heritage or landscape receptors. We would seek the ExA to therefore request that the applicant explains how its routing, siting, design and construction methodology have had regard to the amenity of Burstall and how noise effects have been avoided, reduced or mitigated so far as reasonably	Construction noise and vibration will be managed through the commitments outlined in **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Appendix F Outline Noise and Vibration Management Plan. [Revision D]**. Commitments relative to construction noise and vibration require the Main Works Constructor(s) to prepare detailed construction noise and vibration assessments and, where necessary, specify mitigation measures to reduce the effects of noise and vibration. The assessment method includes different significance thresholds for different times of day and for different days of the week, allowing appropriate assessments of impacts irrespective of the timing of the works. The assessments and mitigation proposals, together with any monitoring and reporting proposals will be submitted for approval by the relevant local planning authority prior to the start of works. The objective is to avoid significant impacts, and the assessment includes appropriate mitigation measures to achieve this. The Applicant notes concerns regarding out-of-hours working. The Project does not rely on routine out-of-hours construction activities. Any such activities would only be undertaken where necessary and in accordance with the controls and approval mechanisms secured through **7.2 Outline Code of Construction Practice [Revision G],** including consultation with the relevant local authority where required. With regards to operational noise, there are no additional sources of operational noise proposed at Bramford substation as part of the Project. Accordingly, no significant operational noise effects are predicted at Burstall or surrounding receptors as a consequence of the Project. The Applicant therefore does not agree that a separate Burstall-specific operational noise assessment is required beyond that already presented within the Environmental Statement.

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		possible (Electricity Act 1989). EN-1 is clear in its support for a receptor specific assessment of both construction and operational noise, how this may impact health and quality of life, and how this may lead to enforceable and measurable DCO requirements for specific areas. BPC consider a specific assessment of Burstall, especially residences and tranquil/ historic/ well visited amenity sites closest to the Bramford Substation, is completed and results shared.	
REP6-143	Burstall Parish Council	Flood Risk BPC request the ExA to specifically request the applicant provides details on how the cumulative flood risk will be managed due to the many ongoing projects at the Bramford Substation including their planned substation extension. We request the response is specific to Burstall and focused on the following locations known for regular flooding: The Channel; Church Hill; and the A1071 junction. In addition, how increased runoff will impact existing drainage to Burstall Hall, Hall Lane and Walnut Tree Farm. The below photo shows the existing flood risk in Burstall, taken in 2023. *[IP attaches photo of a flooded path]*	A cumulative impact assessment has been conducted and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** At Burstall, the Project avoids any interaction with The Channel and the floodplain of the Belstead Brook and will not therefore contribute to any increase in flood risk from these sources. All rainfall that falls onto areas of impermeable land cover created by the Project during its construction and operation will be captured at source, collected and conveyed to a range of drainage features that will store the water and attenuate it, until it is either soaked back into the ground where conditions are suitable, or released to nearby watercourses at rates no greater than pre-development rates. The Project, where it is developed to the north and upslope of Church Hill, would not contribute any additional runoff to exacerbate existing flooding issues of this route, nor of the A1071 junction. Existing drainage systems serving Burstall Hall, Hall Lane and Walnut Tree Farm would not be burdened by an additional runoff (over and above pre-development runoff) from the Project. Drainage proposals presented within **8.2 Drainage Strategy DCO [Revision D],** updated for submission at Deadline 7, have been developed to accord with National and local drainage standards. A further level of detail will be developed by the Main Works Contractor(s), in accordance with commitment GG22 within the **7.2 Outline Code of Construction Practice [Revision G]**, for review and approval by the relevant flood risk management authorities to discharge Requirement 4 of the **3.1 Draft DCO [Revision G]**.
REP6-143	Burstall Parish Council	Dark Skies. BPC request ExA to confirm with the applicant how dark skies will be maintained given the cumulative impact from the many projects ongoing at the Bramford Substation. We request that the Bramford Substation site is specifically assessed in the Lighting Design Strategy to ensure there is no cumulative light pollution, all light when used is contained within the substation with no light spill outside, specifically around the perimeter, that use of light is tightly controlled and that the dark skies around Burstall are maintained. BPC have, on several occasions over the last year, had to contact the BDC Enforcement team due to lights being left on overnight at the Bramford Substation site, with the spill of lights illuminating the night sky and on one occasion actually pointing towards the village (see photo below taken from Hall Lane, 1km south of the substation, showing illumination in the west of the substation at 1918 hrs on 18 January 2026). For this reason, as well as the assessment requested above, BPC would also like to see very detailed conditions and controls on the use of light at the substation.	The Applicant has responded on measures proposed to reduce light spill under items 5.4d and 5.4e in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. The operational lighting requirements for the proposed new and extended substations are set out in Section 5.2 of the **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision E]**, and an Operational Lighting Management Strategy is included in Appendix B. The figure included in Appendix B.1 of the **7.16 DASSI [Revision E]** illustrates the indicative light spill around the extension of the substation. The use of operational lighting associated with the substations and substation extensions would be limited to fault response activities or security call outs, and the default position would be for lighting to be off. No assessment of operational lighting on landscape and visual receptors was therefore undertaken, due to the limited potential for significant effects.

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REP6-155	National Highways	DRAFT DCO SUBMITTED AT DEADLINE 5 [the Applicant notes National Highways submitted their version of their protective provisions. These are not repeated here and are instead dealt with separately.] As noted at Issue Specific Hearing 4, National Highways are concerned that agreement may not be reached on the form of the protective provisions included in Part 5 of Schedule 16 for the benefit of National Highways in its capacity as strategic highway authority. Separate protective provisions are being negotiated by Lower Thames Crossing. Set out below are the outstanding issues that remain with the protective provisions and Requirements currently included in the dDCO. The dDCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions and the Requirements.	The Applicant does not agree that the form of the protective provisions in Part Five of the dDCO will cause serious detriment to National Highways (NH). The Applicant has explained its conclusions in relation to this in **8.29.8 Application under Section 127 Planning Act 2008 - National Highways Limited (Revision A)**. The Applicant has further explained the differences between the drafting sought by NH and the Applicant in the appendix to the **8.7 Statutory Undertaker Tracker [Revision F]** submitted at Deadline 7.
NREP6-155	National Highways	Protective Provisions *The IP provides a summary of the outstanding matters and changes that NH are seeking.*	The Applicant does not agree that the form of the protective provisions in Part Five of the dDCO will cause serious detriment to National Highways (NH). The Applicant has explained its conclusions in relation to this in **8.29.8 Application under Section 127 Planning Act 2008 - National Highways Limited (Revision A)**. The Applicant has further explained the differences between the drafting sought by NH and the Applicant in the appendix to the **8.7 Statutory Undertaker Tracker [Revision F]** submitted at Deadline 7.
REP6-145	Colchester City Council	CCC also has the following comments on two important submissions from IP's at D5: • The Planscape Landscape and Visual Technical Note [REP5-277] and • The Landscape Partnership Landscape Sensitivity Appraisal [REP5-226] CCC wish to thank the respective groups who commissioned the reports in this vitally important area in landscape terms. Both reports demonstrate the severity of the impacts on the Colne Valley. It shows that NGETs responses are too broad brush and hence the commissioned reports looking at the area with a more granular view. They demonstrate that the Colne Valley meets the criteria for a valued landscape. CCC wants to once again repeat that NGET have not responded to the findings of its own reports nor the new reports and should have provided undergrounding here. It is common ground that the Colne Valley is special, but NGET have not responded to this value in a meaningful way with actual scheme changes. As an example, pylons are located just outside the National Landscape. The applicant considers that as soon as you leave the	The Applicant provided a detailed response to the two cited reports at Deadline 6 and refers CCC to these documents: • Response to the Planscape Report: Appendix B of **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]** • Response to Landscape Partnership report: Appendix D2 of **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**

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		NL residual harm is acceptable. EN5 clearly states it is not. The Colne Valley is contiguous with the NL and is of a special quality as set out by the reports noted above. The two landscapes sit side by side and are used contiguously and are experienced contiguously. The access routes into the NL are via the Colne Valley, passing beneath the proposed infrastructure. The Colne Valley has many of the same characteristics of the NL and has clear links to it.	
REP6-155	National Highways	Appendix 1 Amendments to Protective Provisions in the dDCO PART 5 FOR THE PROTECTION OF NATIONAL HIGHWAYS LIMITED Application etc., [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] (2) Except where expressly amended by the Order the operation of the powers and duties of National Highways or the Secretary of State under the 1980 Act, the 1984 Act, the 1991 Act, the Transport Act 2000, or the Town and Country Planning (General Permitted Development) (England) Order 2015 shall continue to apply in respect of the exercise of all National Highways' statutory functions. (3) ~~This Part of this Schedule does not apply to any works or activities that are regulated by the provisions of Part 3 of the 1991 Act or articles 11(1) (street works), 14(1) (power to alter layout, etc. of streets), 17(1) (access to works) and 49 (traffic regulation) of this Order.~~ Interpretation 2.(1) Where the terms ~~used~~ defined in this Part of this Schedule are inconsistent with the terms defined in article 2 (interpretation) of this Order ~~are inconsistent with sub-paragraph (2) below the latter~~the former prevail. (2) In this Part of this Schedule— "as built information" means one electronic copy of the following information where National Highways deems ~~reasonably~~ necessary— [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155]	The Applicant has detailed the differences between the drafting sought by National Highways and the Applicant in the appendix to the **8.7 Statutory Undertaker Tracker [Revision F]** submitted at Deadline 7 and as such, does not repeat these here.

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		(l) such other information including CCTV surveys as is required by National Highways to be used to update all relevant databases and to ensure compliance with National Highway's Asset Data Management Manual as is in operation at the relevant time or any successor of it including CCTV surveys;. "bond" means a bond in the form annexed hereto at Annex 1 (or substantially in such form) duly executed by the undertaker and a reputable UK surety company or other UK financial institution to be previously approved in writing by National Highways (such approval not to be unreasonably withheld or delayed); "the bond sum" means 200% of the cost of carrying out the phase of the specified works (to include all costs plus any commuted sum for such phase), or such other sum agreed between the undertaker and National Highways, to be provided to National Highways in the form of: a) a bond; or b) a cash surety; or c) where agreed by National Highways a combination of a bond and cash surety; "cash surety" means a cash deposit to be paid by the undertaker into an account specified by National Highways; "commuted sum" means such sum calculated as provided for in paragraph 16 of this Part of this Schedule to be used to fund the future cost of maintaining ~~the specified works~~any new National Highways assets, structures or apparatus provided under the Order; "condition survey" means a survey of the condition of National Highways structures and assets ~~within the Order limits~~ that in the reasonable opinion of National Highways may be affected by the specified works and further to include a CCTV survey of specified drains that National Highways reasonably considers may be materially and adversely affected by a specified work; [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] (d) drainage and ducting as required by DMRB CD 535 Drainage asset data and risk management and DMRB CS551 Drainage surveys – standards for Highways~~;~~ [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155]	

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		“phase” means that part of the specified works which is to be carried out in separate phases in the areas identified as Work Nos. [ ] on the works plans or such other phasing arrangements agreed between the undertaker and National Highways from time to time; [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] ~~"security" means, in respect of any phase or element of the specified works, either:~~ ~~(w) a letter of credit; or~~ ~~(x) such other information that evidences the credit standing of the undertaker;~~ [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] “specified works” means so much of any work, including highway works, street works, surveys and signalisation ~~or part thereof~~, authorised by this Order including any maintenance of that work, as is undertaken in on under or over the strategic road network or land in which National Highways ~~is the highway authority~~has an interest and “specified work” shall be construed accordingly; “strategic road network” means any part of the road network including trunk roads, special roads or streets for which National Highways is the highway authority including structures, drainage infrastructure, street furniture, verges and vegetation and all other highway assets together with all land, apparatus and rights located in, on, over or under the highway ~~for which National Highways is the highway authority~~; [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] General 4. Notwithstanding the limits of deviation permitted pursuant to article 5 of this Order, no works in carrying out, maintaining or diverting the authorised development may be carried out in on under or over the strategic road network ~~at a distance within 5.5 metres vertically of the lowest point of the ground unless with the express consent~~unless such works are agreed in writing with National Highways at the absolute discretion of National Highways ~~save in respect of any temporary oversailing equipment which falls below the 5.5m height temporarily~~	

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		~~during construction, provided that such equipment's installed position is above 5.5m, where such express consent is not required.~~ [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] Prior approvals and security ~~7.(1) In respect of any specified works being at least 5.5 metres above the surface of the strategic road network (including any temporary oversailing equipment which falls below the 5.5m height temporarily during construction, provided that such equipment's installed position is above 5.5m), such works must not commence until—~~ 7.(1) The specified works must not commence until— (a) a stage 1 and stage 2 road safety audit has been carried out and all recommendations raised by them or any exceptions are approved by National Highways; (b) the programme of works has been approved by National Highways; (c) the detailed design of the specified works comprising of the following details, insofar as considered relevant by National Highways, has been submitted to and approved by National Highways— (i) the detailed design information, incorporating all recommendations and any exceptions approved by National Highways under sub-paragraph (a); (ii) details of the proposed road space bookings and at the same time as submitting the relevant details the undertaker shall be entitled to submit its application for road space bookings to National Highways; (iii) the identity and qualifications of the contractor and nominated persons; (iv) a process for stakeholder liaison, with key stakeholders to be identified and agreed between National Highways and the undertaker; and (v) information demonstrating that the walking, cycling and horse riding assessment and review process undertaken by the undertaker in relation to the specified works has been adhered to in accordance with DMRB GG142 – Designing for walking, cycling and horse riding or any successor document; ~~(d)~~(a) ~~where necessary, a scheme of traffic management has been submitted by the undertaker and approved by National Highways such scheme to be capable of amendment by agreement between the undertaker and National Highways from time to time;~~ ~~(e) unless otherwise agreed by National Highways.~~	

Examination Library ID	Name	Matter	NG Response
		~~(1) In respect of specified works save for those which fall under sub-paragraph (1), such works must not commence until—~~ ~~(c) a stage 1 and stage 2 road safety audit has been carried out and all recommendations raised by them or any exceptions are approved by National Highways;~~ ~~(d) the programme of works has been approved by National Highways;~~ ~~(e) the detailed design of the specified works comprising of the following details, insofar as considered relevant by National Highways, has been submitted to and approved by National Highways—~~ ~~(ii) the detailed design information, incorporating all recommendations and any exceptions approved by National Highways under sub-paragraph (a);~~ ~~(i)~~(ii) details of the proposed road space bookings and at the same time as submitting the relevant details the undertaker shall be entitled to submit its application for road space bookings to National Highways; ~~(ii)~~(iii) the identity and qualifications of the contractor and nominated persons; ~~(iii)~~(iv) a process for stakeholder liaison, with key stakeholders to be identified and agreed between National Highways and the undertaker; and ~~(iv)~~(v) information demonstrating that the walking, cycling and horse riding assessment and review process undertaken by the undertaker in relation to the specified works has been adhered to in accordance with DMRB GG142 – Designing for walking, cycling and horse riding or any successor document; ~~(f)~~(d) a scheme of traffic management has been submitted by the undertaker and approved by National Highways such scheme to be capable of amendment by agreement between the undertaker and National Highways from time to time; ~~(g)~~(e) stakeholder liaison has taken place in accordance with the process for such liaison agreed between the undertaker and National Highways under sub-paragraph (c)(v) above; ~~(h)~~(f) National Highways has approved the audit brief and CVs for all road safety audits and exceptions to items raised in accordance with the road safety audit standard; ~~(i)~~(g) the undertaker has agreed the estimate of the commuted sum with National Highways; ~~(j)~~(h) the scope of all maintenance operations (routine inspections, incident management, reactive and third party damage) to be carried out by the undertaker during the construction of the specified works (which	

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		must include winter maintenance) has been agreed in writing by National Highways; ~~(k)~~(i) the undertaker has procured to National Highways collateral warranties in a form approved by National Highways from the contractor and designer of the specified works in favour of National Highways to include covenants requiring the contractor and designer to exercise all reasonable skill care and diligence in designing and constructing the specified works, including in the selection of materials, goods, equipment and plant; ~~(l)~~(j)any further information that National Highways may reasonably request within 14 days of the submission of the detailed design of a specified works has been supplied to National Highways; and ~~(m)~~(k) a condition survey and regime of monitoring has been agreed in writing by National Highways. (2) The undertaker must not exercise— (a) article [ ] (maintenance of authorised development); (b) article [ ] (street works) (c) article [ ] (power to alter layout, etc. of streets); (d) article [ ] (permanent stopping up of streets, rights of way and rights of access); ~~(a)~~(e) article ~~16~~[ ] (temporary ~~closure~~stopping up of streets ~~and public~~, rights of way and rights of access); (f) article [ ] (access to works) (g) article [ ] (traffic regulation); ~~(b)~~(h) article ~~20~~[ ] (discharge of water); ~~(c)~~(i) article ~~21~~[ ] (protective works to buildings); ~~(d)~~(j) article ~~22~~[ ] (authority to survey and investigate the land),; (k) article [ ] (compulsory acquisition of land); (l) article [ ] (compulsory acquisition of rights); (m) article [ ] (extinguishment and suspension of private rights) (n) article [ ] (use of subsoil under or airspace over streets) (o) article [ ] (temporary use of land by [NGN]) (p) article [ ] (temporary use of land for carrying out the authorised development); (q) article [ ] temporary use of land for maintaining the authorised development); or (r) article [ ] (felling or lopping trees) of this Order, over any part of the strategic road network or land in which National Highways has an interest without the consent of National Highways, and National Highways may in connection with any such exercise require the undertaker to provide details of any proposed road	

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		space bookings and submit a scheme of traffic management for National Highways' approval. (3) ~~(~~National Highways must prior to the commencement of the specified works or the exercise of any power referenced in sub-paragraph (2) inform the undertaker of the identity of the person who will act as a point of contact on behalf of National Highways for consideration of the information required under sub-paragraphs (1) or (2). (4) Any approval of National Highways required under this paragraph—- (a) must not be unreasonably withheld ~~or delayed;~~ (b) must be given in writing; and (c) may be subject to any conditions as National Highways considers necessary~~; and~~. (d) ~~will be deemed to be approved if National Highways has not determined the approval within 28 days of the undertaker's request for approval.~~ (5) Any change to the identity of the contractor and/or designer of the specified works will be notified to National Highways immediately and details of their suitability to deliver the specified works will be provided on request along with collateral warranties in a form agreed by National Highways. (6) Any change to the detailed design of the specified works must be approved by National Highways in accordance with paragraph 1 of this Part. (7) Any reference to deemed consent in any of the articles of this Order shall not apply to any application for consent, agreement or approval required or contemplated to be given by National Highways Construction of the specified works 8.(1) The undertaker must give National Highways ~~28 days~~'3 months' notice in writing of the date on which the specified works will start unless otherwise agreed by National Highways. (2) The undertaker must comply with National Highways' road space booking procedures when booking road space on the strategic road network prior to and during the carrying out of the specified works and no specified works for which a road space booking is required shall commence without a road space booking having first been secured from National Highways. (3) The specified works must be carried out by the undertaker to the satisfaction of National Highways in accordance with— [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and	

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		locations for reference presented, see original in REP6-155] (6) If any part of the specified works is constructed—- (a) other than in accordance with the requirements of this Part of this Schedule; or (b) in a way that causes damage to the highway, highway structure or asset or any other land of National Highways, National Highways ~~acting reasonably~~ may by notice in writing require the undertaker, at the undertaker's own expense, to comply promptly with the requirements of this Part of this Schedule or remedy any damage notified to the undertaker under this Part of this Schedule, to the ~~reasonable~~ satisfaction of National Highways. (7) If during the carrying out of the authorised development the undertaker or its appointed contractors or agents causes damage to the strategic road network then National Highways ~~acting reasonably~~ may by notice in writing require the undertaker, at its own expense, to remedy the damage. [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] Payments (c) [contractual costs properly payable to the highway operations and maintenance contractor as a consequence of any specified works, including costs incurred by the highway operations and maintenance contractor in carrying out the tasks referred to in sub-paragraphs (a) and (b) of this paragraph, in which case National Highways will be responsible for the payment of any sums received from the undertaker under this paragraph to the highway operations and maintenance contractor];the checking and approval of the information required to determine approvals under this Order; (d) where relevant, all costs in relation to the transfer of any land required for the specified works; (e) all legal and administrative costs and disbursements incurred by National Highways in connection with the Order and sub-paragraphs (a)-(d); and (f) any value added tax which is payable by National Highways in respect of such costs and expenses arising under this paragraph and for which it cannot obtain reinstatement from HM Revenue and Customs, together comprising "the NH costs". (2) The undertaker must pay to National Highways upon demand and prior to such costs being incurred the total	

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		costs that National Highways believe will be properly and necessarily incurred by National Highways in undertaking any statutory procedure or preparing and bringing into force any traffic regulation order or orders necessary to carry out or for effectively implementing the authorised development. (3) National Highways must provide the undertaker with a schedule showing its estimate of the NH costs prior to the commencement of the specified works and the undertaker must pay to National Highways the estimate of the NH costs prior to commencing the specified works and in any event prior to National Highways incurring any cost ~~but the absence of such estimate will not inhibit the commencement of the specified works by the undertaker.~~. (4) If at any time after the payment referred to in sub-paragraph (3) has become payable, National Highways reasonably believes that the NH costs will exceed the estimated NH costs it may give notice to the undertaker of the amount that it believes the NH costs will exceed the estimate (the excess) and the undertaker must pay to National Highways within 28 days of the date of the notice a sum equal to the excess. (5) National Highways must give the undertaker a ~~fmal~~final account of the NH costs referred to in sub-paragraph 9 above within 91 days of the issue of the provisional certificate issued pursuant to paragraph 10(4). [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] Provisional Certificate 10.(1) Following the completion of any phase of the specified works or prior to reopening any part of the strategic road network following any closure or partial closure, whichever shall be sooner, the undertaker shall notify National Highways who will carry out a site inspection to satisfy itself that the strategic road network is, in its opinion, safe for traffic and the undertaker must comply with any requirements of National Highways following the site inspection. [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] (d) ~~in respect of any specified works captured by paragraph 67(2))~~ the undertaker has paid the commuted sum to National Highways,	

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		National Highways must issue the provisional certificate. (5) Following the issue of the provisional certificate, National Highways shall reduce the bond sum relevant to the phase in writing to 20% of the total bond sum for that phase provided that in the event any claim or claims have been made against the undertaker or liability on its part has arisen under the bond sum for any phase (which here shall also include any claim or claims to which National Highways are joined howsoever they arise) before that date National Highways will be at liberty to retain a sufficient sum in addition to the 20% to ensure it does not have to meet any costs for and/or arising from and/or in connection with any of the specified works. (6) The undertaker must submit a stage 4 road safety audit as required by and in line with the timescales stipulated in the road safety audit standard. The undertaker must comply with the findings of the stage 4 road safety audit and must pay all costs of and incidental to such and provide updated as-built information to National Highways. Opening 11.~~(1)~~ Unless otherwise agreed in writing by National Highways the undertaker must notify National Highways not less than 56 days in advance of the intended date of opening to the public of the strategic road network and the undertaker must notify National Highways of the actual date the strategic road network will be opened to the public within 14 days of that date and must not open the strategic road network to the public prior to the expiration of the requisite notice period. Final condition survey 12.(1)The undertaker must, as soon as reasonably practicable after making its application for a provisional certificate pursuant to paragraph 10(2), arrange for the highways structures and assets that were the subject of the condition survey to be re-surveyed and must submit the re-survey to National Highways for its approval. The re-survey will include a renewed geotechnical assessment required by DMRB CD622 if the phase of specified works include any works beneath the strategic road network. (2) If the re-surveys carried out pursuant to paragraph 12 indicates that any damage has been caused to a structure or asset, the undertaker must submit a scheme for remedial works in writing to National Highways for its approval in writing and the undertaker must carry out the remedial works at its own cost and in accordance with	

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		the scheme submitted~~.~~ and such programme as National Highways may require. (3) If the undertaker fails to carry out the remedial work in accordance with the approved scheme and programme pursuant to paragraph (2)12(2) or fails to submit a scheme for remedial works to National Highways, National Highways may carry out the steps required of the undertaker and may recover on ~~receipt of a proper invoice~~written demand any expenditure from the undertaker it reasonably incurs in so doing. (4) National Highways may, at its discretion, at the same time as giving its approval to the re-surveys pursuant to paragraph 12 give notice in writing that National Highways will remedy any damage identified in the re-surveys and National Highways may recover on ~~receipt of a proper invoice~~written demand any expenditure from the undertaker it reasonably incurs in so doing. (5) The undertaker must make available to National Highways upon request copies of any survey or inspection reports produced pursuant to any inspection or survey of any specified work following its completion that the undertaker may from time to time carry out. Defects Period 13.(1) The undertaker must at its own expense remedy any defects in the strategic road network as are reasonably required by National Highways to be remedied during the defects period for the relevant phase. All identified defects must be remedied in accordance with the following timescales— (a) in respect of matters of urgency, within 24 hours of receiving notification for the same (urgency to be determined at the absolute discretion of National Highways); (b) in respect of matters which National Highways considers to be serious defects or faults, within 14 days of receiving notification of the same; and (c) in respect of all other defects notified to the undertaker, within 4 weeks of receiving notification of the same. (2) ~~During the defects period~~Following the issuing of the provisional certificate National Highways retainshas responsibility for routine maintenance of the strategic road network save for any soft landscaping works which must be established and which must thereafter be maintained for a period of 3 years by and at the expense of the undertaker. Final Certificate 14. (1)The undertaker must apply to National Highways for the final certificate for each phase of the specified	

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		works ~~or part thereof~~ no sooner than 12 months from the date of the provisional certificate for that phase. [Applicant note: the entirety of Appendix 1 has not been reproduced instead only the tracked changes and locations for reference presented, see original in REP6-155] (b) the NH costs have been paid to National Highways in full; National Highways must issue the final certificate and upon the issue of the final certificate the bond sum for that phase is released in full provided that in the event any claim or claims have been made against the undertaker or liability on its part has arisen under the bond sum (which here shall also include any claim or claims to which National Highways are joined howsoever they arise) National Highways will be at liberty to retain a sufficient sum to ensure it does not have to meet any costs for and/or arising from and/or in connection with the specified works. (5) The undertaker must pay to National Highways within 28 days of demand the costs incurred by National Highways in identifying the defects and supervising and inspecting the undertaker's work to remedy the defects that it is required to remedy pursuant to this paragraph 0. Security 15.(1)No phase of the specified works must not commence until the undertaker procures that the specified works are secured by the bond sum to indemnify National Highways against all losses, damages, costs or expenses arising from any breach of any one or more of the obligations of the undertaker in respect of the exercise of the powers under this Order and the specified works under the provisions of this Part of this Schedule. ~~(1) The specified works must not commence until the undertaker provides the security.~~If at any time the undertaker is in breach of these provisions of this Part of this Schedule or becomes insolvent without prejudice to any other remedy National Highways is entitled upon giving notice to the undertaker to ~~complete that phase or element of the specified works that has been commenced by the undertaker and maintain the same and call upon the undertaker to reimburse it for the cost expended in respect of the same provided that:~~ ~~unless there is a danger to users of the highway, National Highways shall first give 28 days prior written notice (or lesser period as may in the circumstances be~~	

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		~~reasonable) of its intention to commence work under this sub-paragraph (2);~~ ~~any notice served under this sub-paragraph (2) shall specify the period of the notice ("the notice period"), the extent of the work which National Highways proposes to carry out, and full details of all matters in respect of which the National Highways considers that the specified works have not been carried out in accordance with this Part of this Schedule; and~~ ~~if before the expiry of the notice period, the undertaker serves written notice upon the National Highways that it intends diligently to execute the works specified in the notice in accordance with this Part of this Schedule, and specifies a time to complete that the National Highways considers reasonable in the circumstances the National Highways shall not be entitled to execute the relevant part or parts of the specified works specified in the notice served under this paragraph unless the undertaker then fails to execute those works within the agreed timescale;~~ use such parts of the bond sum as National Highways considers necessary. For the avoidance of doubt should National Highways have to carry out works pursuant to this Part of this Schedule it may, at its sole discretion, use the bond sum to forward fund such works. Commuted sums 16. (1)National Highways must provide to the undertaker an estimate of the commuted sum, calculated in accordance with FS Guidance S278 Commuted Lump Sum Calculation Method dated 18 January 2010 or any successor guidance, prior to the commencement of the specified works. (2) The undertaker must pay to National Highways the commuted sum in respect of each phase prior to the issue of the provisional certificate for that phase. Insurance 17. Prior to the commencement of the specified works the undertaker must effect public liability insurance with an insurer in the minimum sum of £~~10,000,000.00 (ten~~50,000,000.00 (50 million pounds) in respect of any one claim against any legal liability for damage loss or injury to any property or any person as a direct result of the execution of specified works or use of the strategic road network by the undertaker. Indemnity 18.(1) The undertaker fully indemnifies National Highways from and against all costs, claims, expenses, damages, losses and liabilities suffered by National Highways arising from or in connection to the	

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		construction, maintenance or use of the specified works or exercise of or failure to exercise any power under this Order and any such costs shall be paid to National Highways within ~~30~~14 days of demand ~~provided that the undertaker's indemnity will not extend to any claims submitted to the relevant highway authority arising out of the negligence of the relevant highway authority's employees or arising after the issue of the final certificate pursuant to paragraph 14(4).~~save for any loss arising out of or in consequence of any negligent act or default of National Highways. (2) The undertaker's duty to indemnify National Highways pursuant to paragraph 18(1) above shall apply in full and further the undertaker's duty to indemnify shall continue in full force and effect until all such claims have been determined, settled and discharged and National Highways reimbursed in full notwithstanding the issue of the final certificate for any phase or the final phase of specified works. ~~1. The relevant highway authority shall:~~ ~~1. notify the undertaker immediately upon receipt of any claims, charges, costs, expenses, liability or losses referred to in sub-paragraph (1);~~ ~~2. at all times after that date keep the undertaker fully informed;~~ ~~3. permit and assist the undertaker to make such investigations and/or tests as the undertaker may reasonably deem necessary to verify such claims, charges, costs, expenses, liability or losses;~~ ~~4. not accept or compromise any claims, charges, costs, expenses, liability or losses to which this indemnity relates without the prior approval of the undertaker as to its validity and as to the amount of the settlement; and~~ ~~5. at the request of the undertaker instruct such reputable firm of solicitors as the undertaker may reasonably specify in respect of the conduct of negotiations and/or proceedings in respect of any claims, charges, costs, expenses, liability or losses to which this indemnity relates.~~ ~~2. The indemnity in sub-paragraph (1) above includes:~~ ~~1. all fees incurred by claimants which the relevant highway authority is obliged to pay, and those of the relevant highway authority or its agent or contractor, in negotiating any claims (together with VAT payable on the claimants' professional advisors' fees);~~ ~~2. statutory interest payments to claimants and their professional advisors; and~~	

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		~~3. the relevant highway authority's reasonable and proper legal costs in making the compensation, fees and interest payments.~~ Maintenance of the specified works 19.(1) The undertaker must, prior to the commencement of any works of maintenance to the specified works, give National Highways 28 days' notice in writing of the date on which those works will start unless otherwise agreed by National Highways, acting reasonably. (2) If, for the purposes of maintaining the specified works, the undertaker needs to occupy any road space, the undertaker must comply with National Highways' road space booking requirements and no maintenance of the specified works for which a road space booking is required shall commence without a road space booking having first been secured ~~(save for in the event of an emergency situation).~~ (3) During any maintenance works, the undertaker must comply with any requirements that National Highways may notify to the undertaker, such requirements to be notified to the undertaker not less than 7 days' in advance of the planned commencement date of the maintenance works. (4) The provisions of paragraph 0 shall apply to the opening of any part of the strategic road network following occupation of any road space under this paragraph. Land 20.(1)Following the issue of the ~~fmal~~final certificate pursuant to paragraph 14(4) National Highways may serve notice on the undertaker that it wishes to take a freehold transfer of land within the extent of strategic road network boundary which is not in the ownership of National Highways but has been acquired by the undertaker for the purposes of carrying out the specified works. (2) If the undertaker receives notice under sub-paragraph 20 then the undertaker must effect a freehold transfer of the land which is the subject of the notice and complete such transfer as soon as reasonably practicable at no cost to National Highways. (3) The undertaker must not under the powers of this Order: (a) to acquire or use land forming part of; (b) acquire new or existing rights over; or ~~(b)~~(c) seek to impose or extinguish any restrictive covenants over; any part of the strategic road network or land owned by National Highways ~~used for its undertaking~~, or	

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		extinguish any existing rights of or interfere with apparatus of National Highways in respect of any third party property, except with the consent of National Highways by written request to ~~legalservicesinbox@nationalhighways.co.uk.~~ (4) Where any land or interest is proposed to be acquired pursuant to this Order for the benefit of National Highways, the undertaker must, unless otherwise agreed by National Highways, exercise article ~~24~~[ ] (compulsory acquisition of land) and article ~~25~~[ ] (compulsory acquisition of rights and imposition of restrictive covenants) as applied by articles ~~36~~[ ] (application of the 1981 Act) and article [ ] (modification of the 2017 Regulations) of this Order to directly vest in National Highways any such land or interest~~.~~ ~~Arbitration~~ Expert Determination 21.~~Any dispute under~~ (1)Article [ ] (arbitration) of the Order does not apply to this Part of this Schedule ~~shall be settled by arbitration in accordance with article 62 (arbitration)~~. (2) Any difference under this Part of this Schedule may be referred to and settled by a single independent and suitable person who holds appropriate professional qualifications and is a member of a professional body relevant to the matter in dispute acting as an expert, such person to be agreed by the differing parties or, in the absence of agreement, identified by the President of the Institution of Civil Engineers. (3) On notification by either party of a dispute, the parties must jointly instruct an expert within 14 days of notification of the dispute. (4) All parties involved in settling any difference must use best endeavours to do so within 21 days from the date that an expert is appointed. (5) The expert must— (a) invite the parties to make submission to the expert in writing and copied to the other party to be received by the expert within 7 days of the expert's appointment; (b) permit a party to comment on the submissions made by the other party within 7 days of receipt of the submission; (c) issue a decision within 7 days of receipt of the submissions under sub-paragraph (b); and (d) give reasons for the decision. (6) Any determination by the expert is final and binding, except in the case of manifest error in which case the difference that has been subject to expert determination	

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		may be referred to and settled by arbitration under article [ ] (arbitration). ~~(2)~~(7) The fees of the expert are payable by the parties in such proportions as the expert may determine or, in the absence of such determination, equally.	
REP6-155	National Highways	Requirements **Part A:** The dDCO has not been updated to address NH's concerns raised in its Relevant Representations on Requirements (see [RR-2657] (paragraph 6), Written Representations [REP1-192] as further supplemented by its Deadline 2 comments [REP2-043] paragraph 2.5 and Table T1.2 (page 24 onwards) and discussion at ISH2 on 28 and 29 April [REP-343] save for the amendment to Requirement 4(1) which is welcomed. [Applicant note: Appendix 2 as referenced here by 'page 24 onwards' is presented in the following row, see original in REP6-155] By way of summary, there are several Requirements included in Schedule 3 of the dDCO which NH has an interest and would expect to be consulted on namely: 8 (retention and removal of trees, woodland and hedgerow), 9 (Re-instatement planting plan) and 10 (Re-instatement schemes) it is noted that the latest version of the dDCO does not address NH's concerns. In relation to Requirements 8 9 and 10, NH require to be consulted where works affect the SRN or relate to land NH have an interest in. This is not unreasonable. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. **Part B:** On Requirement 7 (Construction hours), NH has previously asked that sub-paragraph (1) which provides for variations to the core terms includes consultation with National Highways. National Highways still have major concerns regarding construction traffic and so NH may need construction traffic to be operated outside peak hours depending on ongoing modelling and discussions with the Applicant regarding the Assessment, which National Highways would want to be fed into this Requirement. This is explained further in section 3 below. **Part C:** On the Discharge of Requirements, paragraph 2, provides that where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker	**Part A response:** With regard to land which NH has an interest in, The Applicant has previously addressed this point in 6.2b of **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** and the position has not changed. It should also be noted that under Schedule 16, Part 5 of the DCO (protective provisions for the protection of National Highways Limited) National Grid cannot carry out specified works in, on, over, under or affecting the Strategic Road Network (SRN) unless the details have first been approved by National Highways. **Part B response:** Requirement 7 secures the working hours that have been assessed as part of the application, including provision for Abnormal Indivisible Load movements outside core construction hours where requested by the relevant highway authority. Where an Abnormal Indivisible Load (AIL) uses or affects the Strategic Road Network, National Highways is typically involved through the ESDAL (Electronic Service Delivery for Abnormal Loads) process. Any change to the assessed working hours proposed by the Applicant can only occur with the prior written approval of the relevant planning authority pursuant to Requirement 7, thereby ensuring local authority control over any proposed departure from the approved position. Should the relevant planning authority think it necessary to consult National Highways, there is nothing in the draft Order that would prevent them from doing so. **Part C response:** National Grid has previously responded to this point at 6.2g of **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** and the position has not changed.

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		as it considers is necessary to enable it to consider the application. Paragraph 2 (2) provides, "If the relevant authority considers further information is necessary and the requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 business days of receipt of the application, notify the undertaker in writing specifying the further information required" and paragraph 2 (3) provides "If the requirement specifies that consultation with a requirement consultee is required, the relevant authority must issue the consultation to the requirement consultee within 5 business days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the requirement consultee within 5 business days of receipt of such a request and in any event within 15 business days of receipt of the application." NH's position is that were it to be required to be consulted, 5 days is not enough time for NH to respond and the time period should be extended.	
REP6-155	National Highways	Appendix 2 Amendments to the Requirements in the dDCO [Applicant note: Appendix 2 table formatting has been aligned with presentation of this document, see original in REP6-155] Requirement: 7 Construction Hours Amendments to Drafting (in red): (1) Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in). (2) No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in). Comments: See above	The Applicant does not consider that the proposed updates to Requirement 7 is necessary. The Applicant has proposed protective provisions in Schedule 16 Part 5 for the benefit of National Highways and these should be read alongside the powers and the requirements in **3.1 Draft DCO [Revision G]**
REP6-155	National Highways	Appendix 2 Amendments to the Requirements in the dDCO [Applicant note: Appendix 2 table formatting has been aligned with presentation of this document, see original in REP6-155]	Please see the response regarding Requirement 7 above. The same response applies here.

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		Requirement: 8. Retention and removal of trees, woodland and hedgerows Amendments to Drafting (in red): (1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in) (4) All trees, groups of trees, woodlands and hedgerows shown on the relevant plan for that stage of the authorised development must be retained and/or removed in accordance with the relevant plan as approved under sub-paragraph (1) for that stage of the authorised development, unless otherwise agreed by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in). Comments: As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the proposals	
REP6-155	National Highways	Appendix 2 Amendments to the Requirements in the dDCO [Applicant note: Appendix 2 table formatting has been aligned with presentation of this document, see original in REP6-155] Requirement: 9. Reinstatement planting plan Amendments to Drafting (in red): (1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where the reinstatement planting affects the Strategic Road Network or land NH have an interest in)….. (5) All reinstatement planting works approved under sub-paragraph (1) must be carried out in accordance with the approved reinstatement planting plan for that stage of the authorised development, unless otherwise	Please see the response regarding Requirement 7 above. The same response applied here.

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		approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in). (7) Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in). Comments: As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the reinstatement planting proposals.	
REP6-155	National Highways	REP6-155Appendix 2 Amendments to the Requirements in the dDCO [Applicant note: Appendix 2 table formatting has been aligned with presentation of this document, see original in REP6-155] Requirement: 10. Reinstatement schemes Amendments to Drafting (in red): (1) Subject to sub-paragraphs (2) and (3), any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve, within ~~21 months~~ 6 months of completion of the construction of the stage of authorised development for which it was required, or such further time as may be approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in). Comments: NH seek the reinstatement of the A120 verge within 6 months following the use of the access ceasing. This is in the interest of maintaining the safe and efficient operation of the SRN. 21 months is an unreasonably long period. Inclusion of the drafting in red would address NH's concern.	The Applicant does not agree that the period for reinstatement of land should be reduced from 21 months to 6 months at this stage, as the detailed construction and reinstatement programme is still under development. The timing of reinstatement will depend on the sequencing of works, temporary land requirements and site-specific construction constraints. Furthermore, the 21-month period links back to the time period in Article 27 (Temporary use of land by the Applicant) and Article 28 (Temporary use of land by UKPN) of **3.1 Draft DCO [Revision G]**, in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months. Notwithstanding the above, the Applicant remains committed to ongoing engagement with National Highways regarding whether different reinstatement periods may be appropriate for specific locations, including areas affecting the A120 verge.

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REP6-155	National Highways	TRAFFIC AND TRANSPORT - CONSTRUCTION IMPACTS Proposed Changes to SRN Roads Physical changes to the SRN at A12 Holton St. Mary, A120 Bentley Road and the A120 at Coggeshall have been agreed by NH. However, agreement to the proposed amendments to Copdock Roundabout (A14 J55) are subject to the satisfactory completion of a Road Safety Audit 1 ("RSA1"), which has not yet been undertaken. This is requested to assess the safety impact of the changes. NH expects to receive the draft RSA1 brief imminently from the Applicant. A Walking, Cycling, and Horse-riding Assessment and Reviews (WCHAR) is needed at any point on the SRN where changes are proposed, in accordance with DMRB. WCHARs, or else an exemption submission, are required for all the locations where physical amendments to the road layout are proposed. These have not yet been received. The trip distribution/assignment for the construction traffic is yet to be fully understood and agreed, and therefore so is the modelling. As a consequence, there may be required mitigations that are not yet known. These potentially unknown changes to the SRN are to be agreed, as required.	As a result of the junction modelling, additional mitigation was identified at the Copdock Roundabout (A14 junction 55) as detailed within **7.11 Transport Assessment [Revision B]**. The preliminary design of this mitigation has been prepared by the Main Works Contractor and the Stage 1 RSA Brief will be issued to National Highways by Deadline 7 or shortly thereafter. A Stage 1 Road Safety Audit site visit is to be arranged and it has been agreed that representatives from National Highways and Suffolk County Council will be in attendance with the Applicant. Walking, Cycling, and Horse-riding Assessment and Reviews (WCHARs) have been prepared at any point on the SRN where changes are proposed, in accordance with DMRB GG 142. Where a WCHAR is not deemed required, an exemption note has been prepared. These documents have now been issued to National highways for review and acceptance. The Applicant notes National Highways' comments on the review of junctions located on the SRN undertaken for the Project. The Applicant is committed to continue to engage with National Highways to gain approval of the modelling undertaken and the associated mitigation measures recommended through this assessment. The Applicant has included provisions in **3.1 Draft DCO [Revision G]** including Protective Provisions, to enable mitigation to the SRN to be agreed and implemented. Meetings were held between the Applicant and National Highways in March and July 2026 to discuss the trip generation, distribution and assignment applied to SRN junctions modelled by the Project. The Applicant maintains that the construction trip generation, distribution and assignment set out in **7.11 Transport Assessment [Revision B]** are robust. To provide further clarification and assurance, the Applicant has supplied National Highways with a more detailed explanation of the methodology and data underpinning the assessment. In addition, the Applicant has committed to providing to National Highways by Deadline 7 supporting calculations underpinning the trip generation, trip distribution and trip assignment assumptions.
REP6-155	National Highways	Assessment Scope NH has identified three junctions which it considers may be affected by HGV routes from quarries to the construction sites and which have not been assessed by the Applicant. Although M25 J30 is include in the assessment scope, NH has questioned why M25 J28, M25 J29 and M11 J8 have not been assessed. This has been discussed with the Applicant, and a response is expected shortly. The trip distribution/ assignment for the construction traffic is yet to be fully understood and agreed, and therefore the scope of the assessment may need to be expanded to fully capture the extents of the impact of the project on the SRN.	The study area comprises all roads along the PARs, wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within **7.11 Transport Assessment Chapter 2 – Project Description [Revision B]**. The Study Area is considered appropriate for the assessment. National Grid presented an early draft of the Transport Assessment (**7.11 Transport Assessment [Revision B]**) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route. The Applicant set out in a meeting with National Highways on 13th January 2026 its justification for why it does not consider necessary to model any additional junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex. The Applicant held meetings with National Highways in May and July 2026 where M11 Junction 8, M25 Junction 28, and M25 Junction 29 were discussed. The Applicant will submit to National Highways by Deadline 7 supporting information concerning these junctions, which is expected to address National Highways' outstanding queries.

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REP6-155	National Highways	Construction Traffic Volumes Whilst National Highways is broadly content with the logic behind the methodology which the Applicant has employed to determine the construction trip generation, distribution and assignment, it has not yet had visibility of the detailed calculations that were made and therefore it is still not possible for NH to agree with the forecast traffic flows at SRN junctions, nor whether the proposed mitigation is appropriate. NH has requested the detailed shapefiles and spreadsheet calculations from the Applicant to enable an understanding of how the forecast traffic volumes have been derived and it is understood that the Applicant has agreed to provide them shortly.	The Applicant notes National Highways' comments on the review of junctions located on the SRN undertaken for the Project. A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, the Applicant provided National Highways with a supporting detail on the trip generation, distribution and assignment including traffic flow diagrams for its review. A subsequent supporting methodology note on construction traffic assignment was prepared and issued to National Highways in June 2026 to explain in greater detail the construction traffic routing strategy, traffic distribution and network assignment. The Applicant has also committed to providing to National Highways by Deadline 7 the supporting calculations that underpinned the trip generation, trip distribution and trip assignment assumptions.
REP6-155	National Highways	Junction Modelling As the demand forecasts (trip generation, distribution and assignment) have not yet been agreed, NH has not undertaken a detailed review of the forecast results of the modelled junctions as these are subject to change. However, a review of the baseline situation has highlighted several sensitive locations on the SRN where additional congestion and queuing caused by construction traffic associated with the project may have unacceptable safety and/or capacity implications. In previous submissions, NH strongly recommended a microsimulation model is applied to the following locations collectively to ensure that the implications on the SRN are fully understood: • A120/Long Green/B11018/Cressing Road junction (Galleys Corner) • A120/A131/B1256 (Marks Farm) Roundabout • B1018/Millennium Way NH became aware shortly before ISH2 on 1/5/26 that a VISSIM model had been partially developed for NH in this location and NH proposed at the ISH that the Applicant could use this model to achieve outputs more cost-effectively and more quickly. This approach was subsequently agreed with the Applicant and information is being provided to enable the model to be run. It is expected that the modelling will be able to commence imminently, with results available in early August (subject to the agreement of the trip distribution and assignment). This is a particularly sensitive location on SRN that already experiences congestion. A particular concern is if eastbound queuing at Galleys Corner is likely to extend to the on-slips of the next junction on the A120 to	The Applicant notes National Highways' position on the status of its review of junctions located on the SRN undertaken for the Project,. The Applicant has agreed with National Highways that VISSIM modelling should be undertaken as a sensitivity check for Site 48: A120/Long Green/B11018/Cressing Road junction (Galleys Corner) and the A120/A131/B1256 (Marks Farm) and B1018/Millenium Way roundabouts. National Grid has provided modelling inputs to enable National Highways' consultants to run the model. The Applicant anticipates that the VISSIM modelling will be completed by the end of August 2026. The Applicant is modelling the A12 Junction 25 and expects to share the results with National Highways by early August 2025. **7.3 Outline Construction Traffic Management Plan [Revision F]** section 5.9.10 sets out that the Main Works Contractor(s) will develop, as part of the final (detailed) CTMP to be prepared by the Main Works Contractor(s), a monitoring and mitigation framework for SRN and local highway junctions. This framework will include a toolkit (menu) of specific mitigation measures – these are already outlined in the Outline CTMP – to be brought forwards if predefined conditions (criteria) are met. Compliance with the Outline CTMP will be secured through Requirement 4 in **3.1 Draft DCO [Revision G]** requiring the submission and approval of a final (detailed) CTMP substantially in accordance with the certified Outline CTMP.

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		the west. The VISSIM model will provide clarity on this matter where the local junction modelling cannot. A12 Junction 25, another sensitive location, was not modelled originally as the Applicant had assumed that the junction would be improved as part of the proposed A12 major scheme. The scheme was cancelled by the Government in Autumn 2025 and the Applicant has therefore agreed to model the junction using Arcady. Results are expected soon. Until the modelling is completed it is not possible to determine the degree of impact in this location and whether mitigation is required.	
REP6-155	National Highways	CONSTRUCTION MANAGEMENT DOCUMENTS An updated Outline Construction Traffic Management Plan ("oCTMP) was submitted at Deadline 5. As noted previously by National Highways, mitigation measures are proposed at a number of SRN locations. As explained above, it is not possible, however, to agree that these are appropriate or adequate until the modelling is agreed with National Highways. The Applicant has however indicated that the oCTMP will be updated to include a Monitor and Manage strategy, enabling mitigation to be brought forward as required in agreement with the relevant Highway Authority. NH supports the principle of this approach but this detail does not yet appear in the oCTMP. Once the oCTMP is updated NH will be able to confirm its position on this proposal at Deadline 7.	The Applicant welcomes National Highways' support for the monitor and manage strategy and confirms that a commitment to develop that strategy has been incorporated within the Outline CTMP. **7.3 Outline Construction Traffic Management Plan [Revision F]** sections 5.4.20 and 5.4.21 include detail on the management of construction vehicle trips through the three-month look ahead. **7.3 Outline Construction Traffic Management Plan [Revision F]** section 5.9.10 sets out that the Main Works Contractor(s) will develop, as part of the final (detailed) CTMP to be prepared by the Main Works Contractor(s), a monitoring and mitigation framework for SRN and local highway junctions. This framework will include a toolkit (menu) of specific mitigation measures – these are already outlined in the Outline CTMP – to be brought forwards if predefined conditions (criteria) are met. Compliance with the Outline CTMP will be secured through Requirement 4 in **3.1 Draft DCO [Revision G]** requiring the submission and approval of a final (detailed) CTMP substantially in accordance with the certified Outline CTMP.
REP6-172	Villages Against Pylons	The need per NPS-EN5 to 'avoid altogether' the Dedham Vale At ISH4, National Grid argued that if Government had intended NPS-EN5 to impose requirements upon them, it would have said so explicitly within NPS-EN5 itself. We agree – and it is our position that it does. The Holford Rules, which are incorporated into NPS-EN5, state that the major areas of highest amenity value must be "avoided altogether", "even if total mileage is somewhat increased in consequence" (paragraph 2.9.17, first bullet point). With respect to National Landscapes, the policy is clear that "even residual impacts may well make an overhead line proposal unacceptable in planning terms" (paragraph 2.9.12). We note that National Grid have made no reference to this requirement to 'avoid altogether', and have made no attempt at the Hearings to defend their position or to discount the alternative routes set out in their own Strategic Options Backcheck and Review – routes which were said to work electrically, and to be more expensive	The Holford Rules set out in paragraph 2.9.17 of National Policy Statement (NPS) EN5 (2024) state that applicants should (not must), *'avoid altogether, if possible, the major areas of highest amenity value...'* The reasoning behind the decision to route through the National Landscape and consideration of other options has been summarised in Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** in addition to details of how features within the National Landscape have been avoided. Full details of the decision making are contained within Section 5.5 of **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** which has been reviewed within the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [Revision B]**). **5.6 Planning Statement [Revision B]** provides an appraisal of the Project's compliance with national policy including NPS EN-1 (2024) and NPS EN-5 (2024); this should be read in conjunction with **5.7 Policy Compliance Document [APP-086].** A response to Villages Against Pylons interpretation of EN-5 is set out below: 1. The starting point for a consideration of whether a CNP power-line project should involve overhead line development is that the government does not believe that the development of overhead lines is incompatible with the applicant's statutory duty in relation to visual and landscape matters in schedule 9 to the Electricity Act 1989. (EN-5 at 2.9.7)

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	than the current proposals only because they were brought forward by National Grid at a later date. National Grid appear to be hopeful that this requirement will be overlooked. We trust that the Inspectorate will not overlook it. If this requirement were properly respected, the discussion below concerning undergrounding along the southern boundary of the Vale and through the Colne Valley would be moot. For the avoidance of doubt, we are not arguing that National Grid's specific alternative route should itself be adopted. We have not considered it in detail, and the public have not been consulted on it. However, the existence of at least one route that is compliant with policy is sufficient to render the current proposals – which are not – incapable of approval.	2. The impacts of such lines are recognised, the impossibility of full mitigation in such cases is also highlighted and said not to countermand the need for overhead lines. (EN-5 at 2.9.11) 3. Notwithstanding this acceptance, overhead lines are the strong starting presumption for electricity network developments in general. (EN-5 at 2.9.20) 4. The strong presumption is reversed "**when** proposed developments will cross **part** of a nationally designated landscape". (EN-5 at 2.9.20) 5. The words used are very clear. The presumption is only reversed **when** development will cross "**part**" of a nationally designated landscape. The submission that the presumption is reversed when development crosses land which is NOT part of a nationally designated landscape is fundamentally misconceived. 6. The argument that the presumption is reversed in the setting of nationally designated landscape is incorrect. The setting of a designated landscape is definitively not "part" of that landscape for the reversal of the general presumption. 7. The matter is taken further beyond doubt by EN-5 Paragraph 2.9.21 which states in the clearest terms that **"In these areas……the strong starting presumption will be that the applicant should underground the relevant section of the line".** 8. The wording is internally consistent and clear. The strong presumption for overhead lines applies generally and is only displaced where development crosses land which is **"part"** of a nationally designated landscape. "**In these areas" (and only in these areas) will the strong starting position be that the applicant should underground "the relevant section" of the line**. 9. The "relevant section of the line" where the strong presumption is reversed in these circumstances is the section of the line which actually crosses the part of and is IN the designated landscape. 10. To read these paragraphs and the EN as a whole in any other way would be to do violence to the language of the NPS. 11. If government had meant the presumption to apply to land which was not "in these areas" or to the settings outside of a designated landscape then it would have said so and clearly. It did not and for a reason. Many of the nation's designated landscapes include significant areas of uplands which have very large settings running to many thousands of hectares. The consequences of reversing the strong presumption in these areas outside the designated areas would be profound and hugely significant in cost and socio-economic and other terms. 12. Again, if government had intended this consequence in relation to a strong presumption, it would have made that position very, very clear. 13. Outside these strong presumptions either way, "and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables", Paragraphs 2.9.23-2.9.25 "additionally" provide a multi-staged process whereby the Secretary of State is able exceptionally to "grant development" for non overhead lines but only where (1) there is a widespread and significant adverse landscape impacts giving rise to recommendations for undergrounding AND (2) the benefits of doing so clearly outweigh extra economic, social or environmental impacts: a tilted balance requiring a clear outweighing. 14. Paragraph 2.9.23 makes it clear that such additional exceptional potential shifting of the strong presumption can arise even "though no part of the proposed development crosses a designated landscape". 15. This additional, exceptional multi-staged method of rebutting the strong presumption is thus available via Paragraph 2.9.23 separate to and independently of and additionally to the strong presumption in favour of undergrounding "IN THESE AREAS" set out in Paragraph 2.9.21.

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			16. There is nothing in this paragraph which extends the strong presumption to underground from Paragraph 2.9.21 to any land outside nationally designated landscapes as argued for by some objectors such as VAP in REP6-172. 17. It is notable that Paragraph 2.9.23 (first bullet) expressly refers to the impact of the setting of an overhead line upon “designated landscapes” (which principally means National Landscapes) as a baseline factor to be considered when weighing whether the benefits of undergrounding “clearly outweigh” the extra economic, social or environmental impacts. The setting of the National Landscape is therefore a consideration pursuant to Paragraphs 2.9.23-2.9.25 rather than the subject of the strong reverse presumption that applies to development within the National Landscape pursuant to Paragraph 2.9.21. 18. The Applicant’s approach to the consideration of the Designated Landscape and its setting in the circumstances of the present case has been thorough, proportionate and in line with EN-1 and EN-5 and the statutory duty to further the purposes pursuant to section 85 of the Countryside and Rights of Way Act 2000. Details of the Applicant’s approach to routing and undergrounding in relation to the Dedham Vale National Landscape and its setting are contained in **[APP-120] 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (Final Issue A**) and submissions to the Examination.
REP6-172	Villages Against Pylons	Mis-statements by National Grid and their representatives regarding the requirements of NPS-EN5 In previous submissions we have highlighted National Grid's repeated misrepresentation of the requirements of NPS-EN5, in particular their claim that policy requires the use of pylons as soon as a route passes outside a protected landscape such as the Dedham Vale. This is not what NPS-EN5 says, and we consider it to have been a deliberate attempt to mislead the public and reduce opposition to their proposals. NPS-EN5 is explicit that the starting presumption in favour of overhead lines is reversed where a route “will cross" a National Landscape. Paragraph 2.9.20 states that in such cases "undergrounding is the starting presumption", subject only to technical infeasibility or where undergrounding itself would cause greater harm. Notably, the words "within" and "cost" do not appear in this context in paragraph 2.9.20. It does not say, for example, that the whole of the section proposed for undergrounding must lie within the protected landscape, nor does it require a cost-benefit analysis to be carried out. It merely requires that the route will cross the National Landscape. As noted above, paragraph 2.9.12 states that even residual impact to a National Landscape is likely to be unacceptable in planning terms. This clearly recognises that the infrastructure need not sit inside the landscape boundary to cause unacceptable harm; and second, that this statement is	The Applicant disagrees with Villages Against Pylons’ interpretation of EN-5 paragraph 2.9.12. The Applicant has responded to this, and the point raised about the duty to ‘seek to further’ the purposes of Dedham Vale National Landscape against item 5.2b in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 38). See also preceding section of this response for the Applicant’s response to Villages Against Pylons interpretation of EN-5. The position of the Applicant on the need for additional undergrounding south of Dedham Vale National Landscape is set out in response to item 5.2b in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 39-44). A response to the point made regarding the setting of Dedham Vale National Landscape is included against item 5.2a in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 33-35). The Applicant notes concerns raised in this and previous submission related to visibility of TB35 and nearby pylons from Dedham Vale National Landscape and also concerns regarding the Colne Valley. The Applicant has responded to similar points in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** and in relation to ExQ1 LV 1.14 in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. These responses are summarised against item 5.2b in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 37-38).

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		significant when read together with the requirement in EN1 that proposals must be acceptable in planning terms in order to be capable of approval. We would add that the requirement to "seek to further" the purpose of a protected landscape, as set out in Section 245 of the Levelling-up and Regeneration Act 2023 (which came into force on 26 December 2023), goes further still. This is an active duty, not a passive one. It is impossible to further a conservation purpose where harm is caused in one part of a protected landscape, even if improvements are made elsewhere within it. There is no scope in the Act for "net harm" calculations or "balancing" of this kind. Paragraph 2.9.23 confirms that there will be "other cases" where undergrounding may be appropriate, even where "no part of the route lies within such a designated landscape" (the phrase "no part" further confirms that a route need not lie wholly within a protected landscape for the presumption to underground the whole route to apply). It is only in this latter case – where no part of the route crosses a protected landscape at all – that NPS-EN5 treats cost as a relevant factor in the planning balance. The phrase "no part" reinforces this reading. It is self-evident that the proposed infrastructure along the southern boundary of the Dedham Vale, and the Sealing End Compound and pylons near to Little Horkesley (TB35/36 to approximately TB40), form part of the same route that crosses the Vale. Where that route or section ends will depend on the relationship of the landscape further along its course to the protected area, but it manifestly cannot end at a point where the infrastructure still causes harm to the protected landscape. Given that the location of TB35/36 is dictated strictly by the cable route through the Vale, and that National Grid themselves accept it will cause harm to the Vale, it cannot be argued that it forms part of a different route or section. It is equally self-evident that harm can be caused to a National Landscape by infrastructure outside its boundaries but within its setting, and that the setting of a protected landscape is integral to its value. On both a plain-English and a technical reading, the provisions of NPS-EN5 recognise this and require its protection. Paragraph 2.9.22 reinforces this by requiring that schemes must seek to further the statutory purposes of	

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		the designated landscape, which can go beyond mere mitigation. Yet National Grid have repeatedly sought to characterise the position otherwise – first to the public during their early non-statutory consultations, then to parish, local and county councils, and now to the Inspectorate itself at ISH4. You will recall that at ISH4, counsel for National Grid inaccurately quoted one paragraph of NPS-EN5 s2.9, and omitted the most operative sentence of a second, in support of the claim that pylons must be used outside the Dedham Vale. This was a striking position for two reasons: (i) it contradicted National Grid's own case that undergrounding is required between Great and Little Horkesley specifically to reduce impact on the Vale; and (ii) it is, as set out above, plainly inconsistent with the text of NPS-EN5. When we read the relevant text of NPS-EN5 aloud to highlight the discrepancy, National Grid did not accept the correction but instead suggested we were referencing the wrong version of the document. We consider this a second, and more serious, attempt to mislead the Inspectorate, given that: (a) National Grid have themselves argued that great weight should be given to the current draft NPS; and (b) the relevant requirements of the previous version are, in any event, the same in all material respects. We trust that the Inspectorate will not be misled. We submit that, regardless of the outcome of the assessment in respect of the Colne Valley, National Grid are required by NPS-EN5 to extend undergrounding between TB35/36 and at least TB40, in order to remove the impact on the Vale caused by proposed infrastructure on the plateau at Little Horkesley. Proposed Infrastructure at this location will lie outside the boundaries of both the Vale and the Colne Valley, but would inarguably fall within the setting of the Vale, would be widely visible across the Vale (per National Grid's own visual impact assessment), and would also be visible from within the Colne Valley. The extent of this visibility is such that the harm goes very significantly beyond the merely "residual". For the avoidance of doubt, our position on the Colne Valley is that it too is deserving of protection, both in its own right and/or as a consequence of its contribution to the Dedham Vale and its setting.	

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		It will therefore be necessary for National Grid to extend the underground section throughout the Colne Valley well beyond TB40.	
REP6-175	Aldham Parish Council	Colne Valley Landscape – Fordham/Fordstreet, Aldham As has been maintained throughout, the three independent Landscape Reports (by qualified Landscape Architects) discussed at the recent ISH4, all assert that Norwich to Tilbury has the “high potential for widespread and significant harm” in the Colne Valley. This also concurs with the views of local councils. We fail to see how the Applicant can interpret otherwise. We note that the Panel requested a response from the Applicant, by Deadline 6, regarding the extreme proximity to residential properties in Green Lane and Hines Close, Aldham of Pylons TB54 and TB55. We welcome the decision to carry out further unaccompanied site visits to Aldham to assess the impact on our village We would argue that while the Colne Valley is not a National Landscape, we do feel that it shares many of the Natural England criteria. This could be a combination of factors, such as: • landscape quality, where natural or man-made landscape is good quality • scenic quality, such as striking coastal landforms • relative wildness, such as distance from housing or having few roads • relative tranquillity, where natural sounds, such as streams or birdsong are predominant • natural heritage features, such as distinctive geology or species and habitat • cultural heritage, which can include the built environment that makes the area unique, such as archaeological remains or historic parkland. Aldham Parish Council endorses and supports, but does not repeat, the analysis by ESNP of the evidence provided to demonstrate how the Colne Valley and that portion of the Roman River Valley affected by the pylons meet the National Landscape Criteria. It may also be worth mentioning in this context the National Grid Visual Impact Provision Project (VIP); this Ofgem-backed scheme is “to reduce visual impacts of electricity infrastructure in protected landscapes”. So, to this end, OHLs have been removed and replaced by underground cables in Snowdonia, Peak District, Cotswolds and Dorset. The inference is clear.	As point of clarification the Applicant does not take the view there is a high potential for widespread and significant adverse landscape visual impact in the Colne Valley. This position is set out against item 5.2b in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 35-44). The Applicant does not judge the Colne Valley to form part of the setting of Dedham Vale National Landscape; nor does it consider that the Colne Valley comes close to meeting national designation status. Responses on these points are included against item 5.2a in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118]** (page 33-34) and also Appendix B of **8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [Revision A]**. The National Grid Visual Impact Provision Project (VIP) is not relevant to the Norwich to Tilbury Project as it relates to existing electricity transmission infrastructure within protected landscapes (National Parks and National Landscapes) in England and Wales). The Project complies with National Policy as set out in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** ‘*2.9.20 of EN-5 states that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes.*’ Tables A13.4.40 to A13.4.43 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** set out the detailed assessment of the Project’s impact on the residential visual amenity of properties on Green Lane and Hines Close, Aldham. This concluded that movement of the Project within the LoD closer to these properties (taking into consideration ‘conductor sway’) would not breach the Residential Visual Amenity Threshold (RVAT) - the point in which it is deemed to affect residential living conditions to such an extent that the matter becomes one of public interest and therefore would need to be considered in the planning balance, and which would, reasonably give rise to such restrictions in the LoD. Notwithstanding the above, the Applicant has made a commitment to restrict the movement of the TB54 and TB55 in Commitment GG34 of the **7.2 Outline Code of Construction Practice [Revision G]** submitted at Deadline 7. The Applicant's full response to Action Point 6 is set out in Section 2.2 of **8.4.17 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]** submitted at Deadline 7.

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REP6-176	Alexandra Camilla Macadam	*[Note: this is transcribed from a handwritten submission and may have inaccuracies where text was ambiguous]* At the ISH2 session 5 on April 29th at the public inquiry the inspectors asked National Grid to reply in writing to my husband Andrew Buxton's talk. They have not yet done this. The view of the proposed 9 pylons from the castle rooftop is on an elevated ridgeline above the cable route – thus more visible. Pylon 27 is 49m AOD above ordnance datum. Point in compound where cable undergrounds is 47m AOD. Therefore T pylons are less intrusive (without fragile trees we can see the CSE). We can already easily see Bramford to Twinstead line which is 3km away. 2025 pylon route suggested by NG is 1km away and pylon J27 is an angle tower, and should be avoided (Holford Rules) Ancient Monuments and Archaeological Areas act 1979 specifically says exceptionally high degree of care is required to a scheduled monument especially visual intrusion and how the asset is experiences and appreciated. It is protected under National Planning Policies NPPF (Section 16, para 199) and local plans. Savills land agents suggested route is north of Brimlin Wood (avoiding J27 angle tower) and would move line to 2 km away, with careful planning of pylons. Raydon wings wish CSE to go North for safety reasons. National Grid says they have to do things as cheaply as acceptable – alas it is NOT acceptable for a scheduled monument of National importance and open to the public for future generations. The 2025 CSE proposed at Raydon cuts off part of my field with underground cable a few metres south. This makes drainage never the same and difficult. Also it makes the small bit of field (SW of cable route) (that does not have a cable) impossible to farm. Can the cable be laid to the edge of the existing field? The location of the route would make it impossible for the use of this field for housing development in the future (if needed for enabling and protect the historic buildings) *[attached proposed route from Savills and email correspondence]*	The Applicant responded to the comments of Mr Andrew Buxton in writing at Deadline 5, at page 142 of **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].** Please further refer to the Applicant's response to Mr Buxton's Deadline 6 submission below [REP6-177]. On the application of the Holford Rules, the Applicant's position is that the nature of the scope covered means that there is likely to be a degree of conflict in most instances, and a balanced judgement is required to routeing and siting decisions through the option appraisal process supported by technical assessment work. The Applicant's position is that the presence of an angle pylon at JC27 does not give rise to unacceptable effects in policy terms which would justify the use of alternative technology such as T pylons. The Applicant has set out its reasoning for the chosen routeing in the various Design Development Reports, including why alternative CSE locations and a more northern alignment are not preferred at Section 6.1 of the 2025 DDR: **5.15 Design Development Report [Revision B].** The Applicant has also responded directly to Raydon Airfield's request for an alternative CSE location to the north of the disused railway line at Action Point 9 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** The Applicant's position is that the presence of underground cabling does not preclude the continuation of farming practices, nor does it outright preclude the development of the site for housing in the future. In this case, the Applicant notes that there is no existing housing allocation in this location, and as such there is no current planning status to the land which would influence the alignment. The impact of the Project on the scheduled monument Wenham Castle (Little Wenham Hall) (1003759) has been assessed and detailed in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The assessment found that the Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a low impact on the value of the asset. It was concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. Historic England was broadly in agreement with the Applicant's assessment although suggested the level of harm might be *closer* (Applicant's emphasis) to a mid-level Less Than Substantial Harm. In response to previously raised concerns regarding this asset the Applicant has restated its position in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]**, page 142-143, and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 76–77 and 222–224. The Applicant is confident that the assessment is robust and proportionate, and that the

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			methodology which has been discussed and agreed with Historic England and relevant Local Planning Authorities heritage advisors, has given appropriate weight to the potential impacts of the Project on this designated asset. Paragraph 7.2.57 of **5.6 Planning Statement [Revision B]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
REP-6-177	Andrew Buxton	I spoke right at the end of ISH2 Day 2 on the subject of heritage at Little Wenham Castle which is a scheduled monument, first scheduled in 1936, and is covered by the Ancient Monuments and Archaeological Areas Act 1979 which creates a legally binding schedule for any works that could damage or alter these sites. Historic England state in their report dated January 28 2026 that “the national importance of the site is not in question". The National Planning Policy Framework backs this up by saying that the threshold for acceptable harm to a scheduled monument is exceptionally high. After my presentation to ISH2 the Chairman asked National Grid to address my points in writing. As far as I am aware that has not happened. I have looked through National Grid's replies on Oral Cases in ISH2 and can find no reference and have been in regular contact with the Inspectorate staff but no result. In an earlier presentation to OFH1 dated February 23 I described National Grid's approach to heritage issues as sloppy because their records did not appear to recognise that scheduled monuments and their settings require special attention. For instance on map 6.11.F2 dated Aug 21 2025 showing Listed buildings only 2 of the 8 Listed buildings in the setting are shown and the fact that the Castle is scheduled is not even recorded. Given the NPPF guidance it is also extraordinary that National Grid think that they have no need to comment	The IP’s concerns raised at ISH2 have been addressed in document **8.26 Response to Rule 17 Letter received 5th June 2026 [REP5a-003]** and which includes the following statement: ‘The Interested Party raised concerns in ISH2 regarding the approach to the assessment of Little Wenham Castle and the impact of the Project on this designated heritage asset, including consideration of alternatives. The Applicant responded regarding Little Wenham Castle (1033405/1003759) and the associated listed buildings in **8.4.12 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194],** page 142-143, and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 76–77 and 222–224.

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		on apparent disagreements with Historic England (ES 6.11.A7 2.60) who say there is not substantial harm but there is mid level harm. Historic England also assesses that there is harm to the Grade 2 star tithe barn which is part of the setting and is the nearest building to the pylon line. Given that the barn is part of the important setting at Little Wenham it is also covered by the 1979 Act. National Grid say in their assessment of harm that the project will be only partially visible due to distance and some vegetation. In the flat land of Suffolk that is not true. It is interesting that National Grid say, in another context (APP-224 8.3) that “Significant effects are identified within 1.5km of overground infrastructure" but in the context of Little Wenham are trying to say that a distance of 1.2km on flat Suffolk farmland is a long way. My guess is that Historic England will know much more about scheduled monuments than National Grid. In my view, the Inspectors were quite right in their schedule of questions dated March 20 HE1.7 to ask National Grid why a mid level of harm is acceptable given the 1979 Act and the NPPF guidance. I am not an objector to the project which is needed to improve the infrastructure of the UK but the construction should not be driven purely by monetary price. I have here an email from National Grid's agents dated April 8 which says that "under Ofgem's funding rules we are required to use the lowest cost option that is acceptable" and I remember at ISH2 making the same point. The setting at Little Wenham is recognised as exceptional, it is not only one of the first brick built buildings in the UK but also is one of the finest examples of mediaeval domestic farm development. There is a considerable community cost to this development in addition to the monetary costs which should also be taken into account. I would also like to draw your attention to the submission dated July 24, 2024, from the Churches Conservation Trust which comments on the effect on the Grade 1 Listed church which is also part of the setting. I ended my written follow up to ISH2 by saying that in 100 years time National Grid will have long gone but Little Wenham Castle which has been in Suffolk since 1260, will still be part of Britain's heritage. It would be a shame if it was known as the Castle by the Pylons	
REP6-179	Bruce Marshall	If it isn’t safe to go under or near our overheads then don’t! It is perfectly safe at the moment! How are we supposed to harvest our crops when it is unsafe to get there! If it isn’t safe to fly from your pre-war airfield then move your airfield!	The request relating to the additional non-intrusive surveys was responded to **in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [REP6-116] [REP6-116]** where the Applicant confirmed that the additional surveys related to non-intrusive surveys only and does not relate to change request. The surveys need to cover an area wider than the Order Limits to understand the

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		NG have told Five Estuaries and North Falls, both now having permission, to get their cables to EACN before it has even got permission itself as though it is a foregone conclusion. We have been to the Tarchon consultation this week to find they have been told the same! It seems the chicks have hatched before the chicken has even laid the eggs!! The NG consultation has been flawed right from the start and they have ignored any comments made at any of the consultations so far as though it is a done deal! They have never considered or priced any other scheme. They have never considered another site for the EACN, there is only 3% (DEFRA) of land this good in the whole country! Ours is some of this quality and we have tried our best to protect it since buying it 1981! Sorry they did release a video of an offshore grid that was apparently cheaper, this didn't stay in the public domain for long! We have more surveys due on our land, some non intrusive on fresh land way outside the draft order limits, why now? Also some intrusive that we missed the paperwork on, they have now come in with the usual threats, no polite reminders! We haven't had any results from the previous surveys yet! I am dread the thought of this ever getting permission, with the threat of hedge and tree removal, with reduced farm and building security, the dust, light and noise pollution from the construction process, the ongoing buzz of the overheads, the years of work trying to get our remaining land back into a productive cycle. There could be up to 5 years of unchecked weed seeds to deal with and the ground compaction from the construction process! I have tried to keep this fairly brief as I can't imagine how much paperwork you all must have to work through! I struggle with the amount of paperwork we are getting here!	environment. The Applicant confirmed that it has no plans to change the Order Limits in relation to the APs landholding. The Applicant understands that the GI licence was sent to the APs agent and discussions have been ongoing for some time regarding this. Licence was issued on 3rd February 2026. Due to a licence not being signed and returned to the Applicant, a s172 has now been served to facilitate access. However, the applicant remains committed to engagement on this point if the AP would like to sign a licence in due course.
REP6-184	Charlotte Banks	The applicant seems to have no idea how inserting pylons into a rural landscape represents a stark conflict between human industrial necessity and the preservation of natural aesthetics. While these towering steel lattices are vital components of modern infrastructure, their presence significantly alters the countryside. The negative effects of pylons on a rural landscape can be understood through three primary lenses: visual pollution, ecological disruption, and the devaluation of cultural and economic heritage.	The Applicant notes these comments and has split the matters into three lines, as set out below.
REP6-184	Charlotte Banks	1. Visual Pollution	The landscape and visual impact assessment forms part of the Environmental Statement and is set out in document **6.13 Chapter 13 – Landscape and Visual [Revision B].** The assessment reports that the

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		The most immediate and jarring impact of pylons is visual. Rural landscapes are often defined by their organic lines and, in East Anglia, its flat and uninterrupted horizons. Pylons introduce rigid industrial geometry and massive vertical scale into environments that are otherwise characterised by natural harmony. Because pylons must stand tall to safely clear trees and structures, they often dominate the skyline, drawing the eye away from natural focal points. This transforms what should be a scenic view into an industrial corridor. The cumulative effect is a loss of the sense of wildness and tranquillity that draws people to rural areas.	Project will result in significant landscape and visual effects along its length. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line. Reference to the term 'cumulative' appears to be related to Project on its own and not cumulative in EIA sense. Effects resulting from the Project, including on wildness and tranquillity, are set out in the document referenced above.
REP6-184	Charlotte Banks	2. Ecological Disruption and Habitat Impacts Beyond the aesthetic damage, the construction and presence of pylons impose physical scars on the land. Setting up an electrical grid requires clearing "right-of-way" corridors through woodlands and fields, including the felling of ancient trees that will take years to replace. Although the applicant says there will be replacement planting, who will look after these trees and water them in what residents believe will be a drier weather system? This process results in habitat fragmentation, breaking up contiguous ecosystems into isolated patches, which can disrupt the movement and breeding patterns of local wildlife. Furthermore, overhead transmission lines pose a direct physical hazard to bird populations. Large birds, such as: Waterfowl, Raptors, Migratory species, often fail to see the thin grounding wires in low-visibility conditions, leading to fatal collisions. The maintenance of corridors beneath pylons also frequently involves chemical clearing or heavy machinery, which can alter local plant communities and encourage invasive species.	<u>Habitat Fragmentation</u> Through careful routeing and siting, the Project has avoided/minimised, as far as practicable, direct impacts to woodland, tree and hedgerow habitats. At detailed design , opportunities to further reduce impacts to these habitats will be explored. The Applicant does not agree that the Project will result in widespread or permanent fragmentation of habitats. Permanent access routes are required for maintenance purposes for the pylons and other infrastructure. These 'right of way' access routes will primarily use existing gates and other existing access points into the land in which the infrastructure is located. The Applicant does not propose to install new surfaced tracks on third-party land for maintenance. These access routes will be typically used by small 4 by 4 vehicles or transit vans and do not require trees to be felled to provide access. On occasion, as time passes between the construction period and maintenance operations, scrub can develop or tree branches can grow over these access routes; this vegetation may need to be cut back to facilitate access, but retained ancient woodland or veteran trees that have been retained during construction would not be at risk. The Applicant acknowledges that some vegetation removal is required to construct the Project and that on-going vegetation management is required to maintain electrical clearance beneath the overhead line. For all temporary works areas, habitats will be reinstated on completion of works and subject to a 5-year aftercare period. While large trees cannot be planted under the overhead lines or above the underground cables, shorter trees, shrubs and herbaceous vegetation will be planted as part of the habitat reinstatement phase, to ensure no severance of habitats in the medium to long-term. Where short-term temporary fragmentation impacts have been identified, mitigation measures have been proposed such as the temporary bat flyways, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]**. In the longer term, reinstatement planting, scrub establishment and habitat enhancement measures will ensure that ecological connectivity is restored and maintained wherever reasonably practicable. <u>Watering replacement planting</u> The Applicant recognises the importance of successful establishment of replacement planting. Trees and shrubs are at their most vulnerable to drought in their first two years following planting. Plant establishment will not rely solely on watering. Good arboricultural and ecological practice will be applied, with the best approach being dependent on the soil, topography, shade from other vegetation and the weather conditions during the establishment phase. Climate change means that storm events are more frequent and this will affect the establishment and growth of replacement planting. Younger trees and 'whips' are generally considered more tolerant and the use of 'mulch' be it mulch mats or other covering material can help with plant establishment maintaining soil moisture levels even in times of drought. The Applicant is committed to securing

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			replacement planting and will ensure that measures are in place and secured through the final Landscape and Ecological Management Plans to maximise the success of establishment, with measures in place to replace plants that fail to establish or put on healthy growth. Bird collision risk The Applicant recognises that certain bird species and groups are vulnerable to collision with overhead lines and so undertook targeted bird surveys to identify flight paths (for details please see **6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [Revision C]** and **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [Revision B])**. The result of this survey work is that no collision risk was identified. Nevertheless, the Applicant has adopted a precautionary approach, and bird diverters have been proposed in two locations.
REP6-184	Charlotte Banks	3. Economic and Cultural Devaluation The degradation of a rural landscape has tangible economic consequences, particularly for communities reliant on tourism and recreation. Landscapes that lose their pristine, untouched character become less appealing to hikers, photographers, and holidaymakers. This decline in aesthetic value directly translates to reduced revenue for local hospitality, guiding, and the tourism businesses. Additionally, pylons can negatively impact rural property values. Homes with prominent views of industrial infrastructure face reduced market demand, as buyers generally seek rural properties for their scenic beauty and peace. Despite what the applicant says, these pylons are having a real effect on property with some mortgages being turned down because of them . Culturally, these structures erode the historic character of ancient landscapes, imposing a modern, utilitarian identity onto areas that may have retained their traditional appearance for centuries. RH128-RG130 will erode such a view which hasn't changed for six hundred years. The ancient deer parks will be littered with industrialisation when there is a way to update the grid without this destruction	Heritage - The IP's concerns regarding the impact of the Project on the historic environment in the area of pylons RG128-RG130 has been addressed by the Applicant at page 46 of **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]**. A response to landscape and visual matters covered in this point is provided in point 1: Visual Pollution. The Applicant has responded to concerns raised by the IP on house prices previously, at page 48 of **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192].**
. REP6-198	Fey Jones	Water Lane, Langham is one of only a handful of Protected Lanes in Essex, and the alteration to the route of the undergrounding through Dedham Vale was taken with scant knowledge of the new ground to be covered, which now includes Water Lane. Having lived by the lane for 40 plus years we have a special interest in preserving it as is. It is a deep sided lane, with elm hedges, frequently with water flowing down it at the far end, wooded in places, no passing places, moss covered at times and frequented largely by walkers, runners, cyclists and wildlife. Many animals including hares, bats in season, and stag beetles can be seen and use the space. If the proposal goes ahead, as I understand the plan, there will be a breach in the lane south of our property for water to be diverted. To do this	The Applicant notes the Respondent's concern with regards to construction traffic in the vicinity of Water Lane. However, the Applicant seeks to emphasise that Water Lane is not proposed as a designated access route for construction traffic nor will it be crossed by any construction traffic. In line with the Construction Routing Strategy set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision F]**, designated 'Primary Access Routes' are proposed to be utilised by general construction traffic on the Project, with certain limited exceptions set out in Paragraph 5.4.2 of **7.3 Outline Construction Traffic Management Plan [Revision F]**. The area in the vicinity of Water Lane is shown on Sheet 7 of **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative highway Mitigation Plans - Section C [REP4-172]**, which establishes that the proposed Primary Access Route for this section is from the A12 on Ipswich Road, denoted as Primary Access Route H14-A1 to Bellmouth JC-B039 in this plan. The Applicant acknowledges that haul road crossings of Docuras Farm Road and Low Lift Cottage Road will be required, though seeks to emphasise that outline designs for these have been developed and assessed through a Road Safety Audit process overseen by Essex County Council as the Local Highway Authority, in line with the approach set out in Section A.3 of **7.11**

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		I am assuming heavy construction traffic will have to use the lane, which is unsuitable for such traffic. Sight lines are restricted and any vehicles approaching from opposite directions involves multiple complex maneuvers, often incurring damage to lane banks or verges. The landscape will change and an attainment pond on the other side of the lane will change the present water flow down the lane. The haul road and construction of undergrounding to the north of our property will destroy the wildlife corridors across the present set aside. A piece of land, not far from the lane, near the proposed haul road, appears to be a permanent access point for the cables. The positioning of this implies access from the lane, as the haul road is 'temporary'. Obviously not ideal. The access point is also right in the middle of our coveted, uninterrupted view across Dedham Vale. It has been hard to obtain any details of this access point and even to ascertain its existence. If the proposal goes ahead it would be preferable if the access point could be moved to its original position to the east of the property, in an unoverlooked field, where access would be possible from the wider Dedham Road.	**Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]**, and are therefore considered to be suitable and appropriate for the proposed usage. Impacts to vegetation either side of Water Lane will be minimised andconcentrated only in the location where the proposed surface water drainage connection is to be constructed. Hedgerow and trees will be reinstated on completion of works in line with the principles set out in **7.4 Outline Landscape and Ecological Management Plan [Revision G].** A full suite of ecology surveys have been undertaken in the area, including bats and invertebrates as presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** Heritage – Water Lane has been identified by the Applicant as a heritage asset (3278) and the impact of the Project has been assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**. Should the Project result in physical impacts on the asset elements such as flanking walls, banks, ditches, hedges etc. would be reinstated as secured by commitment H06 of **7.2 Outline Code of Construction Practice [Revision G**].
REP6-198	Fey Jones	The rerouting was done hastily without adequate timing to do necessary ecological/wildlife surveys. Without some form of prior investigation ecological damage may be done. We see bats but have not identified them, we hear owls but don't know the nest sites, we have snakes and stag beetles in the garden, invertebrates ….., small mammals…. etc. We presumed that such work would be done in a timely manner and so the results could be acted upon as necessary. As yet there has been little evidence of this.	A full suite of ecology surveys have been undertaken in the area, including bats, birds, reptiles and invertebrates, as presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The route was selected to avoid, as far as practicable, known habitats and features of ecological value. Targeted surveys have been undertaken to confirm the presence or absence of ecological constraints, and the route has been adjusted to avoid constraints where they have been identified through survey work, including a maternity bat roost near St Mary's Church. The route will continue to be adjusted at the detailed design stage to avoid, as far as practicable, direct impacts to habitats and features of value to wildlife. Where there are direct impacts trained Ecological Clerks of Works will be employed to ensure that measures are implemented as set out in the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** to avoid harm to wildlife. Replacement planting is to be provided where habitats are to be temporarily removed to facilitate the Project. The justification for progressing the alternative underground cable alignment further west of Langham is set out at Section 6.4 of the **2025 DDR (**see **5.15 Design Development Report [Revision B])**
REP6-202	Gillian Parrish	I've been looking at the Nature Opportunity Maps for Hutton. I know these maps are intended to focus on trees, wildlife and habitats, but there are a few things that really concern me and I'd be grateful for your thoughts as our property is not even on the map . 1. [redacted text] isn't even shown on the map. They've used an old map, despite us having lived here for [redacted text] can they properly assess the impact on us when our home isn't even accurately represented? 2. What with the overhead pylons on top we also have UKPN proposing underground cables through our fields	1. The Applicant has provided a response to concerns raised regarding the landscape opportunity maps at Appendix A of **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A].** 2.The Applicant seeks rights for an OHL and a new tower TB207. A temporary haul road is also proposed across the AP'sland. The permanent access route - usually used infrequently for annual inspections – is proposed through a yard which is the subject of a planning consent. The Applicant acknowledges the AP's concern surrounding the UKPN underground works and the Applicant's proposals. The Applicant will continue to engage with the AP and their appointed agent to provide clarity and mitigate impacts where possible. A further meeting in July has been offered to the

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		as well. The cumulative impact is devastating and is completely destroying our lives, our land and everything we've worked for@. 3. Our fields aren't just empty land. They are used for our livery business, with horses grazing there every day. The proposed works will affect the horses, their welfare, access to grazing, and the day-to-day running of the yard. The uncertainty alone has already caused us to lose liveries, and we're desperately trying to keep the business going despite everything that's happening. It's also halted our planning approval for 7 houses as the Pylons and underground cables are not only in the field within 50 meters from the stables and our home but closer to the planning site. 4. I'm becoming increasingly worried about my husband. [redacted text]. How neither of us need at our ages. National Grid and their contractors are due to come to our property on 7th July, and he feels so strongly about protecting our home that he's talking about closing the gates and refusing to let them in. I'm genuinely worried about his wellbeing and don't know how to handle the situation. Inspectorate I honestly don't know what to do anymore. I would be so grateful for a site visit from you as requested several times or any advice or support you can give. I feel completely overwhelmed and don't want to make the wrong decisions. I'm going to attach a few photos of our home and land so you can see exactly what we're fighting to protect. It means everything to our family and has been our home for the [redacted text *[The IP attaches four photos- see REP6-202]*	AP's family to progress the understanding of mitigation to assist the running of the existing livery yard and development proposals. 3. The Applicant understands the concerns raised regarding the welfare of horses in livery. As engagement continues, the Applicant will work with the AP to further understand the specific needs of the business and protect its clients and the animals in its care from undue alarm and / or impacts on their safety and security. The Applicant assures the AP that it will not access their property to undertake preliminary or investigative surveys without agreeing with the AP / business owner to understand and follow specific procedures to ensure that disturbance to the livery business and horses is minimised and that the wellbeing and safety of horses is prioritised. Acknowledging also the particular concerns that the AP has raised in their point 4 regarding visits to their property the Applicant is willing to facilitate a meeting elsewhere, if this is helpful, to further progress discussions around this matter. The Applicant notes that outline planning permission has been granted under 24/00373/OUT with conditions to be made by 20/09/2027. The Applicant, along with the AP, commissioned a planning consultant to provide advice to the AP in respect of alternative planning options. The Applicant continues to be open to engaging with the AP to provide clarity in order to help reduce uncertainty where it is possible for the applicant to do so, and will, where possible, provide further information to the AP, including, where reasonable, commissioning further studies reflecting the existing use and consented residential use. 4. The Applicant notes and is sympathetic to the concerns raised by the AP in relation to the effect of the Project and the impacts on the health of a member of the AP's household. Whilst the need to undertake site investigative surveys to better inform the design of the scheme and ensure the most efficient and appropriate construction methodologies are deployed cannot be avoided, the Applicant is willing to meet with the AP and their representatives at a location other than their property for the purposes of providing further information as to the nature of the work to be carried out (including also to further understand the sensitivities to the livery business), if this will alleviate the concerns experienced. An offer of this meeting has been made through the Applicant's land agent to the AP's land agent.
REP6-204	Helen Dorothy Keeler	The Waltham Gap should be treated to an issue specific hearing as it is the point where the proposed route has the maximum number of listed affects including ecological, heritage, health and population. The adjustments proposed by National Grid do not address the issues raised by Chelmsford Council, the Parish council or any other affected landowners or parties. The proposed solution is not acceptable. In particluar the currently proposed pylon TB 141 is right next to the property Windmill House is almost exactly 35m from the border and 58m from the house itself (nearest corner). The distances claimed by National Grid are factually incorrect at The Waltham Gap, giving false reasurance that the route proposed through the Waltham Gap protects the residents of WIndmill House and the many amenity users who will walk under the pylon route daily. The large width of the short height pylon as currently proposed is over 30m and means that the actual cables on the outside of the widest/lower arm of the pylon will	As outlined in Table 2.19 of **8.11 Approach to Scenarios [Revision E]** the Applicant has progressed a change to the alignment and pylon types at the Walthams. The pylons south- west of the River Chelmer were changed to standard pylons, enabling the removal of one pylon in proximity of Windmill House. This change also enabled a move of pylon TB141 to the west, so it is now positioned approximately 88 m and 112 m south-west of the curtilage border and property respectively. This is illustrated on **2.3 Works Plans - Section F [REP5-019]** at Deadline 5 (see Sheets 3 and 4). Additionally the Applicant has included an aspirational commitment, ADDR – 82 of **Appendix F of 8.4.14 Applicant's Comments on any Further Information or Submissions [REP6-114]** which seeks to move TB141 as far as practicable along the alignment to the south-west to increase separation from the property (this is subject to ongoing detailed design). The alignment in this location is dictated by angle pylon TB140 that is restricted to the north in the spans back to TB135 by the River Chelmer, proximity and effects on Langley's and some veteran trees to the west and the B1008 to the east (also the Scheduled Monument 'Settlement at Ash Tree Corner'). To the west the next angle pylon at TB143 is restricted to southerly movements by the location of Ball's Farm and associated residential properties. It is for these reasons that the alignment is positioned where it is to the south of Windmill House.

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		only be 20m from our border and approx. 43m from the house. Note that we also saw a link which suggested that that pylon may yet be moved back to the original location the other side of Chelmsford Road (i.e. per the original proposal) following the recent PI visit to Langleys but we don't know exactly what that means or if it's definite and now part of the current planning proposal). As a rough guide when looking at the various maps, the distance from our border to the border of the BT exchange across he field is almost exactly 100m. A question NG have never responded on is why, given how narrow the Waltham gap is in the first place, the route is closer to Windmill House (a dwelling with people living in it) not right in the middle of the gap or even closer to the exchange (with no residents)	
REP6-208	Jayne Marshall	NG continues to give no consideration to the grade1 BMV land in and around Ardleigh and fails to acknowledge just how important this area is for food production. NG continues to ignore the cumulative effects on Ardleigh's residents who would suffer years of disruption both during and post construction (EACN, three substations and an interconnector). The harms associated with noise still have not been satisfactorily addressed by NG. NG confirmed that operational noise level would be no more than 35 decibels (db) from the EACN, but how noisy is that and what have we to compare it with? This does not take into consideration the additional and cumulative noise generated from the respective neighbouring NorthFalls and Five Esturaries substations (consented) or the proposed Tarchon Interconnector (non consented)! NG said that noise surveys were carried out over an eight day period in February 2025; at a time when trees and hedgerows would have been bare of leaves and foliage. I question why such surveys weren't carried out throughout the year! Proposed tree and hedge removal would further add to noise travelling a greater distance, thus affecting more residents! It is very difficult to estimate noise levels from construction vehicles and their audible reversing warning systems as; once again, we have nothing to compare it with! No mention of potential noise from generators and pumps! We were told that these would be needed to pump water from trenches and pylon bases on our land due to the water table and may need to run 24/7, which would be totally unacceptable! I feel that NG has insufficiently addressed dust issues during the proposed construction period of this major project. This remains a major issue for local residents and communities and given that dust (in particular finer	<u>Noise</u> An operational noise rating level of 35 dB $L_{Ar,Tr}$ is considered to be low, below the level at which adverse effects would occur, and therefore meets the requirements of planning policy. This level does include the cumulative effects of other proposed substations. The actual noise rating level from the EACN will therefore be lower. The Applicant has identified that it misspoke during Issue Specific Hearing 4 in relation to the timing of the baseline noise surveys for the EACN. The baseline surveys for the proposed Tilbury North surveys were undertaken over an eight day period in February 2025, whereas the EACN survey was undertaken over between seven and twelve days in September and October 2022. This has been clarified in **8.5.13 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. These durations are sufficient for obtaining a reliable baseline and in line with standard practice. The modelling does not include the noise attenuation effects of foliage, as a worst-case. Irrespective, noise attenuation effects of foliage are negligible. With regards to construction noise, and in particular the generators and pumps, these would be subject to detailed assessment and mitigation as part of a range of commitments in **7.2 Outline Code of Construction Practice [Revision G]**; principally NV01 to NV05. These also require that the detailed assessments, mitigation proposals, and monitoring and reporting proposals are submitted to and agreed by the relevant local planning authority prior to the start of works. <u>Ecology</u> The impact assessment and route selection have been informed by a suite of ecological surveys and desk study searches that commenced at the scoping stage in 2022 and continued into late summer 2025. The route was selected to avoid, as far as practicable, known habitats and features of ecological value. A detailed ecological assessment was undertaken and presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The route will continue to be adjusted at the detailed design stage (post-consent) to avoid, as far as practicable, direct impacts to habitats and features of value to wildlife. Where there are direct impacts mitigation measures will be implemented as set out in the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G].** Replacement planting is to be provided where habitats are to be temporarily removed to facilitate the Project. The Project would have no long-term significant negative effect on wildlife. <u>Air Quality</u> The construction dust assessment is in **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results**

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		particles) can travel many miles, the flat landscape will offer little protection. Under UK Law, this could be classified as a “statutory nuisance.” NG still fails to recognise harms from potential loss of ancient hedgerows and mature trees (some with TPO status), which for us, also provides essential security for our home and farmland. NG continues to have disregard for the wildlife that we have a duty to respect and care for. It concerns us that the much loved wildlife we currently have on the farm, will disappear.	**[Revision B].** The assessment followed industry best practice guidance set out in the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction. Without mitigation there would be a negligible effect from dust beyond 250m of the Order Limits. The assessment concludes that with the appropriate implementation of dust mitigation which is set out in **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]** there would be no significant effect from dust on sensitive receptors within 250m. Agriculture and Soils During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [Revision B]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (**5.6 Planning Statement [Revision B]**). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. The Applicant would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims (as stated in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]**) for disturbance are considered on a case-by-case basis, if negative impacts on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner. This includes the potential use of soil stabilisation only in subsoil (i.e. topsoil would not be treated) where it would result in no materially different effects and any use would be developed by the Soil Scientist to ensure there was an appropriate testing schedule to confirm the suitability prior to implementation. These measures, including the aftercare period, will ensure the soils have returned to their preconstruction condition. Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [Revision B]** confirms the amount of agricultural land to be permanently impacted.
REP6-208	Jayne Marshall	We received (hand delivered on 30.06.2026) from NG, Legal Notice for access for entry for surveys pursuant to section 174 of the Housing and Planning Act 2016, acquiring authority for the purposes of sections 172-179. To date, we have not signed licences produced by NG because we had been told that by doing so, we would no longer be able to object to the project. We have, however, permitted access for all survey work to date, but on our terms (eg must be post harvest and whilst a	The Applicant understands that the GI licence was sent to the APs agent and discussions have been ongoing for some time regarding this. The GI Licence was issued on 3rd February 2026. Due to a licence not being signed and returned to the Applicant, a s172 has now been served to facilitate access. However, the applicant remains committed to engagement on this point if the AP would like to sign a licence in due course. Returning a licence does not preclude a landowners involvement with the examining process, and there is no written reference to this within the licence to suggest this is the case.

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		family member is on site). The one licence we did sign (for intrusive archeological survey work), was drawn up by our land agent and ourselves and approved by NG. WEhave, from day one, requested for all data to be shared with us as the landowners. We were told that this would happen, but as yet, nothing! It's our land and we should be privy to such information. NG's heads of terms are currently not fit for purpose and we are still being advised by our Land Agent not to sign anything! Our Land Agent continues to battle with NG on behalf of numerous landowners, so we're not alone! Wecontinue to feel a profound sense of injustice in knowing that we may be forced to surrender rights over our property, when alternative solutions (eg integrated offshore grid or HVDC underground cabling) have not been transparently explored. Wecontinue to feel bullied and intimidated by NG's hellbent mission to deliver a project which is so destructive and archaic!	Advanced compensation would be paid ahead of surveys on receipt of a signed licence to cover any potential losses, any reasonable additional losses above the advanced compensation would be considered on receipt of an evidenced claim. HOTs V3 template has been shared with the APs representative and ongoing discussions are being undertaken. The request for survey information has been received and is being processed.
REP6-212	John Stacey	Continued lack of engagement with NG. We met up with both NG and UKPN on the 12 May 2026 at the farm. We had expected answers following our visit with FG on the 25TH February where we discussed re sighting our horses and crossing points, amongst other items. This meeting on the 12th with NG was not very productive as we had no answers, instead more questions remained unanswered. Our land agent has since had an email on the 23rd June. Concerning the horses this is their response. *National Grid's proposals for managing the impact on our horses;* • *As discussed on site, when I have dealt with similar equine uses on other projects, the usual steps are to mitigate the impact by offering compensation for livery costs off site. 1* • *This is a welfare and compensation matter that I will pick up directly with your agent, Paul Walker.* All along during the consultation once they were aware that we would not accept the line running across the horse paddock whilst the horses were there we were told that we were a special case. Moving our horses from their home on to a livery is not acceptable. As the haul road runs through the paddock the length of time the horses would need to be on livery could be as many as 5 years. We will not uproot them from the only home they have known for the past 14 years in their old age . One is 23 years old , he may only have 2 to 3 years left, he will not be spending those years away from his home. They are ridden around the farm on a daily basis. My wife rides and looks after them and has a job so her	The Applicant met with the AP's agent on 15 July 2026 and discussed the AP's concerns at length. The Applicant is engaged in dialogue on the appropriate mitigation measures and in reaching a solution. The Applicant requires further information before it can make an informed decision on the appropriate mitigation measures. The provision of this information is dependent upon a response from the landowner's agent, and is necessary to enable negotiations to progress towards a practical and mutually acceptable resolution. In relation to equestrian concerns, the Applicant acknowledges the AP's concerns for the welfare of their two horses during and after construction. There has been a misunderstanding in respect of a livery option solution. The Applicant met with the AP's agent on 15 July 2026 and a solution for the AP's concerns was discussed at length. A full review of the mitigation measures around the horses will be undertaken once the associated costings are provided. The Applicant encourages the AP/ AP's agent to provide these promptly, acknowledging the pressing timeline ahead of Autumn planting activities for an alternative paddock solution to be considered as a mitigation. The AP's agent (Paul Walker) has been fully briefed on the steps required to alleviate the AP's concern and the Applicant awaits the necessary information in order to put into effect the most practical and pragmatic solution.

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		time is not unlimited, whilst I am available if needed to look after them whilst she is at work. If they are on livery it is very doubtful if there will be a similar chance of riding out. Bringing them back home to ride out will be time consuming and expensive. At the very least we had expected that NG would fund the resighting of the stable, manege and paddock. This needs agreeing very soon as the grass needs to be established well before the horses need moving and the chosen new area needs to be unplanted this autumn.	
REP6-212	John Stacey	The other issue is that once the line is operational it will cross the existing paddock. NG have indicated that at Writtle University they will raise the line to reduce the maximum electric fields to below the 5 kV/m reference level recommended by policy to mitigate indirect effects of microshocks. The guidance NG refers to is voluntary but is not guidance for horses. Horses are larger than humans, have metal shoes and may have a rider on board. During the consultation we were told that we may have to be careful handling horses under the wire and they may regularly receive a shock. Raising the wire line by 2m as proposed by NG at Writtle will only offset the height of the horse and rider. Looking at the guide: Power Lines : Control of Microshocks and other indirect effects of public exposure to electric fields. In the guide is does give several scenarios where micro shocks can occur, the ones that can occur for the horses are : Ungrounded person touches grass with bare feet or legs. Person riding , leading, or touching horse or other animal. It also states " As well as the physical sensation of the microshock, microshocks could in some circumstances give rise to further effects, either if the shock causes a person to startle with dangerous consequences, or if repeated cause aversive responses to the situation that produces them." "Microshocks depend on the sizes of the objects concerned as well as the size of the field, so there is no threshold for electric field for the preventing microshocks. However , in many circumstances the risk of perceiving a microshock and its severity diminish significantly as the field is reduced below 5Kvm -1, the reference level in the ICNIRP guidelines " These guidelines are for the public and not for horses which can be 500kg+ , with four metal shoes. These guidelines clearly show that the risk is still there. For us the EMF may still be over the guidelines as the wires are still the standard height, so for horse and rider wellbeing and safety we will not be able to use our paddock safety. The fact that NG are putting the line through our paddock is not voluntary for us. NG own survey	NPS EN-5 sets out clear guidance on the requirements for developers with regards to electric and magnetic field requirements when developing new overhead lines. Compliance with the EMF requirements of NPS EN-5 has been demonstrated in **7.8 Electric and Magnetic Field Compliance Report [REP3-034]**. The Code of Practice which has been voluntarily applied by the Applicant, provides requirements for controlling microshocks; specifically applicable to new overhead lines is avoiding creating electric fields of 5 kV/m or greater in homes, other land in residential use, their curtilages and schools. Equestrian facilities are not explicitly mentioned as those requiring mitigation, despite being a scenario listed in the Code of Practice. However, the span over the Mr Stacey's paddocks, TB 97 to 98 has sufficient clearance to ensure that the electric field is below 5 kV/m, as detailed in the Code of Practice, meaning that the provisions of the Code of Practice for the control of microshocks have in fact been met even though this is not a requirement because the land use is not one listed in the Code. The Applicant operates over 7000 km of existing transmission overhead lines in England and Wales, much of which was built in the 1950's and 1960's. These existing lines cross numerous paddocks, and areas associated with equestrian usage, despite being built before any guidance on microshocks were established. In the Applicant's experience, microshocks do not pose a significant risk to equine or human safety, even without the additional measures applied in line with the Code of Practice. The Applicant is not aware of any evidence to suggest that horses are more vulnerable to microshocks, and as the Code of Practice discusses, microshocks result from the charge collected on a conducting object. The fact that horses do not have insulating shoes, like humans may wear, means that any charge collected on the horse can dissipate to earth more easily, reducing the risk of microshock occurring in general. Reductions to the electric field, in line with those detailed in the Code of Practice again mitigate the risk of microshocks occurring. The Applicant has not identified any reason why the AP would be unable to make safe use of the paddock. If microshocks were to occur, which the Applicant does not think is the case, the Code of Practice provides a suite of measures which can be utilised to provide further mitigation, if required. Accordingly, the Applicant considers that the paddock can continue to be used safely for its existing purposes.

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		highlighted that the line should avoid the paddock, was this to do with microshocks ?	
REP6-212	John Stacey	Continued lack of engagement with UKPN. We met up with UKPN on site on the 12th of May as well and have heard nothing from them since. We had earlier met up with the contractor at our land agents. They asked us when would be a suitable time to underground the 11KVA cable through our yard, it may take 5 weeks to carry out the undergrounding. Unfortunately, there is no suitable time as it's a working farm and the farm yard is small with the undergrounding stopping the yard from being used for HGV lorries. It runs in front of our only grain store. The only answer I could give is Christmas. The OHL runs up the farm drive and then underground between the house and garage and back over ground from the pole at the back of the garden and then continues over to Silver End. When we had the meeting we found out why the undergrounding had been moved from following the line from behind the house which we thought was the plan before July 2025. UKPN gave one reason for the change that they did not like the cable being under ground between the house and garage, I then questioned was this because there was no easement for this underground cable? We are still awaiting an answer. Anyway, we offered to route the new undergrounding cable along a new route around the edge of the garage and then it could join up with the original planned undergrounding. This would be quicker , cheaper and significantly reduce harm to our business. Unfortunately UKPN told us that would be outside the DCO and NG would need to approve. We have not heard anything, why would we as once the secretary of State approves it they will have the powers and we will have to take it to Court to put in this alternative, simpler route. All of this could have been avoided if we had had a site visit before the Draft Order was set. A common theme here. NG are telling us we will be able to claim injurious compensation if proven. This will be difficult to calculate exactly and to prove, though the stress and anxiety this will cause will be immeasurable and severe, it is already doing so just with the thought of having to virtually shut the farm down for an undefined period of time.	The Applicant understands that UKPN met with the Affected Person on site in May 2026 to discuss the proposed diversion works and potential route options. The Applicant and UKPN will continue to engage with affected landowners as the design develops and detailed construction planning progresses. Where alternative routing options are proposed by landowners, these will be reviewed and considered against technical, safety, environmental and deliverability requirements, together with the requirements of the authorised scheme. Previous discussions have acknowledged that alternative alignments outside the draft Order Limits may be capable of being pursued through separate agreement if all relevant parties agree and the necessary technical and project requirements can be satisfied. The Applicant recognises the importance of maintaining farm operations and access to agricultural buildings during construction. Detailed construction methodologies, programme sequencing and access arrangements will continue to be refined during the detailed design stage and through ongoing engagement with affected landowners. The Applicant will seek, where reasonably practicable, to minimise disruption to farming activities and provide appropriate notice of construction activities. The Applicant and UKPN will continue to engage with the Affected Person regarding the timing and implementation of any diversion works. The Applicant acknowledges the concerns raised regarding business disruption, stress and uncertainty associated with the proposed works. The Planning Act 2008 provides a statutory framework for compensation where loss is incurred as a result of the exercise of DCO powers. In addition, where landowners provide evidence of likely construction-related impacts, the Applicant remains willing to consider reasonable mitigation measures through continued engagement. The availability of compensation does not replace the Applicant's commitment to seek to avoid or reduce impacts where reasonably practicable. The Applicant will continue to work collaboratively with UKPN and the Affected Person to understand site-specific constraints and to identify opportunities to reduce impacts on the farming business whilst ensuring that the diversion works remain safe, technically feasible and capable of being delivered.
REP6-212	John Stacey	RVAA Our frustration is the accuracy of the information that NG may have used when they made the assessment whether it was breached. The main ones are that I had to point out that we have views of the project from three	Table A13.4.55 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** acknowledges that this property would experience visibility of the Project in three directions. Paragraph 13.2.14 within document **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** states that '*Fieldwork was undertaken in winter 2025*'. This

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		elevations and not two. Looking at the field study we have realised that according to NG this was carried out in Winter 2025, this in practice is between 21/12/2025 and 20/03/2026. This is actually after the DCO was submitted, I guess another mistake. When I asked at the previous hearing I learned that it would have been from the public access area like a footpath. We want to know if this was carried out correctly. We need to see evidence of the field survey especially as the date NG will now claim is another one of their many mistakes, I would expect there to be photographic evidence to show us along with the report . For the assessment, looking at the response in the recent hearing to Bobby Brown from BDC, NG used the term of the effects in the round from LITGN219. This is in the glossary of terms that is referred too. This is the guidance NG have used for the RVAA. It's interesting to look at page 10. *4.10 The existing (or baseline) visual amenity of a residential property should be described in terms of the type, nature, extent, and quality of views that may be experienced 'in the round' (see glossary) from the dwelling itself, including its 'domestic curtilage' (domestic gardens and access drives).* On page 16 *'In the round' 'In the round' means the combined or all-round visual amenity experience at, or from a property. Visual amenity is "the overall pleasantness of the views they enjoy of their surroundings" (paragraph 2.20, page 21; GLVIA)* I do not recollect views from our garden being mentioned, if they were please can NG highlight them? For views from the house we will be able to see the project from every room except our bathroom, which has frosted glass. The other issue is the assessment is supposed to be from our curtilage according to NG. This a copy of the planned submission that Roise Pearson from Pylons East Anglia Ltd *[IP provides a section of the transcript to ISH4]* The first time the distance from our curtilage was mentioned was when NG actually stated that due to the Lod the nearest pylon IS 70m from the garden. Looking at some of the inaccuracies NG have used to make their assessment and back up their assessment, I have listed below to emphasize NG's lack of accuracy. APP233 Page 87 (Initial assessment by NG) - We accept the description, but the measurement is 175m, this is we have tried to access and would likely be from the centre of the house to the centre of the pylon.	refers to the winter months of January to March 2025, and not December 2025 to March 2026. This point is reinforced by the fact that original version of this document (**Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment - Part 1 [APP-233]**) is dated 'June 2025'. Such fieldwork (i.e. walking of the public rights of way through the centre of the farmstead, which extend within 30 m of the dwelling and the collection of baseline information to satisfy the requirements of paragraph 13.2.13 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment - Part 1 [APP-233]**) was undertaken correctly. Views from the garden of Whiteheads Farm are mentioned on multiple occasions within Table A13.4.3 on page 81 and 82 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment - Part 1 [APP-233]** and within Table A13.4.55 of the same document (and subsequent revision of this up to and including **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**). The distance of '70 m' stated in the Interested Party's submission refers to the approximate distance that there would be from edge of this property's garden to a pylon in the worst-case scenario that it would be moved from the planned centre line of work (shown on shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**), i.e. the most likely route to come forward, to a position at the closest point within the LoD. The 175m stated in the Interested Party's submission refers to the distance from the centre of the property to the closest proposed pylon. On the basis of the above explanations, we do not recognise the claimed inaccuracies of our assessment expressed in the Interested Party's submission. The Applicant set out its position in respect of all other matters raised in the Interested Party's submission here in Tables A13.4.3 and A13.4.55 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** and on pages 335-6 of document **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 (Final Issue A) [REP-298]**.

Examination Library ID	Name	Matter	NG Response
		Page 165 (further assessment) Distance 164m.- The trees referred to is actually a tall old deciduous hedge, but the evergreen hedge is not continuous. Views of TB99 from the south west facing elevation are to the left and not the right. There would be little filtering of views from the garden of TB99. The conclusion: We do not agree that only the first floor windows would have direct views of the closet pylon. The reference to closing the curtains may be correct in the winter months but in the summer months when daylight hours are longer curtains are barely drawn , so that assumption is not correct. The build form referenced can only be the horse stables which is not in direct line of views from the house to the pylon, it is only about 4m high compared to a pylon that could be nearly 60. The opinion that the slightly more distant view of the pylon reduces the perceived height of the pylon is a complete load of rubbish. The views of the project will be overwhelming and dominant in its surrounds and will mean that the quality of life living in such an open and pleasant back drop will be lost. The overall consideration strongly considered the distance from the pylons as being one of the considerations that there was not a breach, the other reason was the oblique view, the view is not oblique from the rear elevation and its patio.	
REP6-212	John Stacey	Limits of Deviation My submission REP1- 380 I questioned if the Lod should be considered along with the assessment to the closest part of the pylon and from the curtilage. NG response REP2-28 NG ignored my comments but just repeated that there was no breach, they did confirm that there will be clear views of TB98 and a high magnitude of visual change My submission Rep2 086 I questioned the varying distances referred to in the applicants references to the nearest pylon of 175m, 165m and 158m could be accounted for whether is the centre of the pylon or the conductor. NG response REP3-073 Even with the Lod NG did not agree that the pylons would be dominant in views, also their proposal is not consistent with planning policy noting that there is no minimum distance specified in guidance. NG response REP4-298 to my submission REP3-139 NG for the first time refences the distance for the Lod of 90m from the building and 70m from the garden. The edge of the garden is actually 30m from the house in the direction of pylon TB98, the closet pylon. NG claimed the project would be visible from only two elevations.	The applicant set out its position in respect of matters raised in the Interested Party's submission in Tables A13.4.3 and A13.4.55 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** and on pages 335-6 of document **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298].** Consequently, no materially new points are raised in this submission.

Examination Library ID	Name	Matter	NG Response
REP6-212	John Stacey	RVAA NG response to 8.9.1 Applicants Response to first written questions . NG response to BDC questions on RVAA now states that the from elevation faces away from the project which is not correct and has the benefit of “intervening elements of screening “ , earlier it referred to screening being limited or there will be clear views. NG response REP5-194 to my submission REP4-405 I had questioned the method of assessment along with whether the proposed visualisation would be accurate. NG referenced where details of the field work could be found. This is where the winter 2025 is shown for the field work. They also highlighted that they make “A reasonable assumption has been made that the most important views from all properties assessed would be from the main living spaces which are used during the day.” How can they make this assumption without visiting each property ? I had questioned why NG had included a planned solar panel farm that cannot be seen from our property and is over a km away. NG have justified its inclusion “in this case , given the expected visual envelope surrounding the solar farm , it was considered appropriate to reference this scheme “ This inclusion just emphasises NG’s aim to mislead everyone.	The Applicant set out its position in respect of matters raised in the Interested Party’s submission in Tables A13.4.3 and A13.4.55 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]** and on page 116 of document **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].** Consequently, no materially new points are raised in this submission.
REP6-212	John Stacey	Visualisations NG Response in REP5-194 to my question of visualisations for worst case scenario and if they will be accurate. NG Response was “ Worst case scenarios will be illustrated within the additional visualisations for Step 4 properties, whereby the extents of the Limits of Deviation corridor will be shown, and these will be made publicly available via the Planning Inspectorate, following Deadline 5 in 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations.” Looking at these visualisation they do not show the worst case, they are as planned. This is demonstrated by the details along the bottom of the image show the nearest pylon is 175m and its height is as planned not the extra 6m extra height it could be. NG again are completely misleading everyone and are hoping to persuade affected parties with lies.	The Applicant set out its position in respect of this issue at Deadline 6 on page 49 of document **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 (Final Issue A) [REP6-118]**. This stated that as there are theoretically multiple design scenarios associated with moving pylons towards properties such as Whiteheads Farm within the LoD, preparation of all of the visualisations shown in document **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]** took the reasonable and consistent approach of showing the closest pylons to the receptor moved perpendicularly from the centre line towards them. The Applicant has, however, assessed the worst-case scenario (whereby the closest pylon is placed at the closest allowable point within the LoD to this residential property) in Table A13.4.55 within document **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**. Consequently, no materially new points are raised in this submission.
REP6-212	John Stacey	Noise In the Issue specific hearing of the 24th June 2026 the KC for the applicant Mr Harris stated “I can go into the only evidence before you establishes that much of the relevant construction phase will take place in rural area where there are few receptors and no likelihood of noise	The Interested Party disputes the indicative construction noise levels presented by the Applicant and has undertaken their own estimation of potential noise levels from activities such as UKPN diversion works, pylon construction, chainsaw use and haul road traffic. The Applicant does not agree that the information presented demonstrates any error in the Environmental Statement (ES) assessment.

Examination Name Library ID	Matter	NG Response
	and disturbance." We feel this is not correct and we questioned that in REP4-405, NG have responded in REP5-194 to my submission as below. *[IP includes extract from the Applicant's response to them in REP5-194]* I do not agree with these figures, but they seem chosen to satisfy NG claims and will lead to the contractor being able to avoid restrictions or mitigation. Just looking at the 64 dB NG are claiming. The UKPN works through the farm yard will be less than 15m from the garden and less than 35m from the house. This will mean digging a trench and breaking through concrete. Another noise will be the chainsaw work required to remove the trees and cut down the hedges behind our house and garden. This will mean working about 30m from our garden. For the pylon construction the area used for the construction for the pylons is not given, but even if only 30m by 30m would mean the construction area is 75m from the house and less than 55m from the garden if using the Lod and could be around 145m from our house and around 115m from our garden. Just looking at the chart A14. 1.2 in APP 262. Pylon construction will be over 65dB if closer than 111m, and around 70 dB if around 70m. If the pylon is as planned For the UPKN works the back filling trench exceedance over 65 dB would be within 47m. For some unknown reason chainsaws have not been included on the noise tables ,it would appear with some research at around 100m the noise level is expected to be between 65 dB and 80 dB There could also be the cumulative effect which would as a rule of thumb add 3 dB. NG claim of 64 dB is difficult to believe, NG claim mitigation is only referenced when questioned because of the Lod. For the haul road which is less than 200m from our house and is probably around 180m from the house, looking at the Table 14.1.2 for Temporary access routes at 200m it 56 dB. This noise from the haul road will be even louder in the garden. It is noted in REP4-164 Construction Hours 2.2.5 "Unless otherwise agreed with the Local Highway Authority, no Heavy Goods Vehicle (HGV) deliveries would be made to site outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays." That would mean the haul road will have a potential on Saturday afternoons to be over the 55 dB, this is without any cumulative affects which is different to the applicants claim. Concerning the start-up and close down it was suggested that at the hearing that some Councils will accept 50 dB , we strongly oppose this and it must meet the "ABC" thresholds of 45 dB.	The construction noise assessment presented in the ES was undertaken using the methodology and source noise data set out in **6.14.A1 Environmental Statement Appendix 14.1 - Construction Noise and Vibration Data [Revision B]** and is based on BS 5228-1 assessment methods. The assessment uses representative construction activities and plant assumptions to identify locations where significant effects may occur and where management or mitigation may be required. The Interested Party's submission relies largely on simplified distance calculations using the indicative reference tables in **6.14.A1 Environmental Statement Appendix 14.1 - Construction Noise and Vibration Data [Revision B]**. Those tables are intended to provide generic noise levels over distance for individual activities and are not site-specific predictions. They do not take account of factors such as: • actual plant selection; • duration and phasing of activities; • screening from topography, buildings, hoarding or temporary barriers; • Best Practicable Means (BPM); • detailed construction methodologies; • the location of activities within the Order Limits; and • project-specific mitigation measures. Consequently, direct comparison of a receptor distance against a single table value does not represent the detailed construction noise assessment process that would be undertaken prior to construction. Regarding pylon construction, the ES assessment already adopts conservative assumptions, including the assumption that percussive piling may be used where required, to identify potential noise hotspots. The assessment therefore does not rely upon quieter construction methods in order to demonstrate acceptable effects. The **7.2 Outline Code of Construction Practice (Revision G)** further commits the Applicant to the use of non-percussive piling methods for pylon foundations except where ground conditions demonstrate that percussive piling is unavoidably required. The Interested Party also refers to chainsaw operations. Tree felling and vegetation clearance activities form part of enabling works and are temporary and short-duration activities. The use of chainsaws would be subject to the same BPM requirements and noise management controls as other construction activities through the **7.2 Outline Noise and Vibration Management Plan [REP6-080]**. In relation to cumulative effects between plant items, the Applicant notes that construction assessments are not based on simply adding 3 dB to individual activity values. Detailed assessments consider the specific combination of plant operating concurrently, their on-times and locations. This process will be undertaken by the Main Works Contractor as required by Commitment NV05 of **7.2 Outline Code of Construction Practice (Revision G)** prior to construction. Where necessary, additional site-specific mitigation measures will be identified and implemented to avoid significant adverse effects. The Interested Party also raises concerns regarding haul road usage and Saturday working. The Applicant notes that different threshold criteria apply to different periods. The construction noise management process requires works during any particular period to be assessed against the applicable threshold for that time period. Where detailed contractor assessments identify a potential exceedance of the relevant threshold after implementation of BPM, additional mitigation and/or temporal restrictions would be required. These controls are secured through the **7.2 Outline Code of Construction Practice (Revision G)** and **7.2 Outline Noise and Vibration Management Plan [Revision D]**. With regard to start-up and close-down activities, the Applicant is not proposing that such activities can take place without control. Any works undertaken during these periods would remain subject to the construction noise management framework and the applicable noise threshold for the relevant time period. The Applicant notes that the construction assessment adopts the lower Category A thresholds from BS 5228-1 as a conservative basis for assessment.

Examination Library ID	Name	Matter	NG Response
			Therefore, the Applicant remains satisfied that the ES assessment, together with the secured commitments contained within the **7.2 Outline Code of Construction Practice (Revision G)** provides a robust assessment of likely effects and a suitable framework to ensure that construction noise is appropriately managed and mitigated.
REP6-212	John Stacey	Working Hours NG claim that their work force work 7am to 7 pm. If this is the case the start up of 6am is not needed and will not lead to any extension to the project finish date ? In terms of weekend works this must be avoided, the increase of noise even at the 55 dB level will be a significant increase of around 20 dB, there is a need for local residents like us to have at least some respite. NG claim that they are using the "ABC " method of noise assessment, but looking at "Jasmine Cottage " NG are using the increase in noise of over 10 dB as the reason for Adverse Significant effect. We will be having around double this even on weekends.	The Applicant has provided further details on why the proposed core working hours are required for the project, and the impact of reduced working hours on the energisation date in **Annex A Programme Narrative for Working Hours Justification of 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117].** Construction traffic noise on the public highway is assessed against a different criteria than construction noise, including construction traffic on haul roads, in line with standard practice.
REP6-212	John Stacey	Farm Safety In NG response REP5 -194 to my submission REP4-405, the applicant has made the claim for line safety clearance that combines can pass safely underneath . They also state " Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines". This will not be the case, the highest point of the largest New Holland RE is 6.56m and with the safe clearance given being 4.3m , the 9.9m line clearance given for our farm is over a metre below what would be needed. NG will undoubtably make the same claim as they have for aviation that if it's unsafe farmers will be restricted to not growing combinable crops under the lines or take a risk to not pass directly under the lines. There is at present an average of one incident a day of farmers having accidents with power lines. For a farmer it will be difficult to assess the lowest point of a line, nothing has been shown what is the expected line sag and how if differs at different temperatures. Have the latest record temperatures and their potential increase been taken into account ? Assessing the lowest point of the line on the day of combining is going to be difficult.	The Applicant's position is that there is no indication that the respondent actually uses or intends to use a combine of the size indicated 'the largest new holland combine'. As such this creates a misleading, hypothetical and disingenuous basis for design. In practice large farm machinery operates safely under overhead lines throughout the UK without impediment. Clearances vary depending on landform and proximity to the pylon being greater the closer to the pylon, and in the case of combines as to whether the unloading auger (usually the highest point) is deployed. The Applicant remains of the view that the response provided, and accompanying documentation establishes a basis for safe working that is appropriate for the circumstances encountered along the route.
REP6-212	John Stacey	Trees Looking at the initial maps for section E there were around 150 individual trees affected. They were telling us for this section in APP 256 Page 15 that in Section E 8 trees and 1 group of trees are to be removed. I see they have modified the map, it's now on REP1.065 , I have not noticed revised figures. In response to my	The Applicant is unclear by the references to pylons and to the image provided as both of these appear to be in the vicinity of pylon TB98 rather than TB96 and TB97. Irrespective of this the Applicant has shown the trees are either 'Unaffected' or 'Potentially Affected' and has committed to reducing tree removal during detailed design, see GG14 of **7.2 Outline Code of Construction Practice [Revision G]**. The Applicant confirms that the commitment for 3:1 tree replacement also applies to category C (low quality) trees. These are shown, without unique tree identification labels, on the arboricultural impacts

Examination Library ID	Name	Matter	NG Response
		submission REP4-405 questioning the trees removed on our farm between TB96 and TB97. NG response in REP-194 “The trees between TB96 and TB97 have been predominantly categorised as low quality, with seven trees of moderate quality unaffected by the Project, labelled as T826–T832 in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].” I have attached a photo [see REP6-212] which shows the trees that will be removed in the field corner between TB97 and TB 96 and are classified as low quality and will not be part of the trees that NG classified that they will plant 3 for 1. As can be seen from the photo at least a few of these trees should be categorised as moderate quality There are also additional trees that will be removed unnecessarily. Looking at the map REP1-065, the plan shows trees and hedge removed along the line running where the UKPN OHL is being removed as shown below. The original plan was to remove the OHL and underground it, at present it is only being removed. Whatever the situation is, there is no need to remove the hedge nor trees.	plan **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]**.
REP6-212	John Stacey	Crossing Points. We discussed crossing points when we meet FG on the 25TH February and ran through where they should be. On the site visit with NG on the 12TH May we had expected confirmation of these. Instead NG gave us no indication of their views on them. The follow up email of the 23rd of June still did not indicate that crossing points had been agreed, instead it would appear that there was no communication with FG on our visit in February. This is demonstrated below in an extract from the most recent email from NG. • We await a plan with your agent’s comments on suitable crossing point locations.	The Applicant does not agree that there has been a lack of engagement regarding crossing points. Discussions on potential crossing point locations took place between the Affected Person, their agent and the Applicant's representatives during meetings, including discussions with Fisher German. The Applicant considers that these discussions formed part of an ongoing process to identify suitable crossing locations and to understand site-specific operational requirements. The subsequent request for a plan showing the agent's comments on crossing point locations reflected the need to formally capture and verify the preferred locations, rather than an absence of previous discussion. The Applicant will continue to engage with the Affected Person and their agent to agree appropriate crossing point arrangements, taking account of agricultural operations, access requirements and construction considerations.
REP6-212	John Stacey	REP3-016 4.2 Funding Statement (Tracked) (Final Issue C) From this document *4. Land Acquisition 4.1.2 National Grid has published guidance, titled Guidance on Land Rights for New Electricity Transmission Assets (National Grid, 2011), which sets out how it will seek to obtain, from the very outset of a project, by negotiation, permanent and temporary land rights for all new electricity transmission assets. National Grid seeks to reach early agreement with all landowners.* For this project this is definitely not the case.	The Applicant does not agree that the approach described in paragraph 4.1.2 of the **4.2 Funding Statement [REP3-016]** has not been followed. National Grid's published guidance reflects its preference to secure land rights through voluntary agreement and to engage with landowners from an early stage. Engagement with the Affected Person has taken place throughout the development of the Project and has included ongoing discussions regarding the land and rights required, design development and potential mitigation measures. The Applicant has sought to engage constructively and will continue negotiations and engagement with the Affected Person with a view to reaching agreement.
REP6-212	John Stacey	Conclusion	See responses to rows above.

Examination Library ID	Name	Matter	NG Response
		NG in the response REP5-194 make claims for noise at Whiteheads Farm which I question, please could NG substantiate their claims by showing their calculations and whether it is from curtilage? The RVAA assessment field studies carried out in Winter 2026 were after the DCO was submitted. The worst case scenario visualisation is not correct as the visualisation shown is for the pylons original planned position with no LoD.	
REP6-231	Rita Watts	There should be no alteration to the full length of low height pylons numbered TB136 to TB142 between Little Waltham and Great Waltham, Essex. As a resident of Little Waltham I would be seriously and very negatively affected by the proposed route of pylons and if they must be built, all the lower height pylons are preferable. The lower height pylons proposed by National Grid, including ALL the pylons numbered TB136 to TB142 would, in my opinion, certainly be preferable to full height 50 metre pylons. A complication has been caused by some requests to move one low height pylon away from the road, between the two villages. National Grid appears to have overreacted to this and may have taken the opportunity to propose to reinstate three full height pylons, in the area, to the southwest of the River Chelmer, in response to this request. Some people may have objected to having a low height pylon close to the road. However, it seems that National Grid might take the opportunity to reinstate three very dominating and intrusive full height pylons in place of the much more preferable lower height pylons proposed for the area. I would much prefer the original plan even though one low height pylon may be rather close to the road. On currently available maps of the pylon route that I can find, there is no indication of the possible change back to full height pylons at three locations between the villages. I therefore wish to claim strongly that any change to the originally proposed low height pylons should not go ahead. All the originally proposed lower pylons would very significantly reduce the impact on the area compared with full height pylons. As they are not shown on the maps currently available I assume and hope National Grid has decided against the requested change and that there will be no further complications. If, however, the above change is planned, there should be publicity about it and a consultation. I have discovered the full situation only just in time for commenting by the deadline and I suggest other potentially affected people would not have been aware of it, especially as the maps I can find do not show the changes that may be proposed	The Applicant has responded to similar concerns raised at REP6-204 above. As explained in this response, the Applicant has decided to progress the alternative scenario (The Walthams and Standard Heights to the south of the River Chelmer) in response to feedback regarding close views from the former Windmill Pub. The change back to standard height pylons south of the River Chelmer allows the removal of one pylon in close proximity to Windmill House, and also allows TB141 to be moved further away from the property whilst not changing the conclusions of the heritage assessment regarding the nearby Designated Heritage Assets.

Examination Library ID	Name	Matter	NG Response
REP6-230	Raydon Wings Aerodrome	*The IP provides commentary on the Applicant's response to [REP4-370]. It is omitted here for ease of reading.*	The Applicant has responded to the Raydon Wings Aerodrome representation within 7.1 of **8.31 Response to the Rule 17 letter received 14 July 2026.** An update to Appendix B of this document, Additional Detailed Design Requests includes ADDR-111 and ADDR-112 in relation to Raydon Wings Aerodrome, and 8.3.35 Signed Statement of Common Ground - Raydon Wings Aerodrome is also submitted at Deadline 7.
REP6-228	Priscilla Latham	*[13 June email to PINS Case Team]* Further to the two very helpful telephone conversations I had with one of your advisers on Thursday 11th June concerning my house not marked as a Listed Building on the Norwich to Tilbury pylons project map, I attach the requested information to enable you to identify the house and correct the information on your documents. [See REP6-228] I have clearly marked the house on the location maps taken from the Norwich to Tilbury. They are pasted onto a Word document to reduce the size of the attachment. I have also provided links to the Official List entry and location map on the Historic England listing on the same document. I should add that the map you use is not accurate as there is a third single storey former farm building (on the south side of the yard in front to the house. Since it is within the curtilage of the house, it is part of the listing. You will see that this building is correctly marked on the Historic England map. *[17 June email to PINS Case Team – comments regarding ExA site visit excluded as they are not appropriate for the Applicant to respond to]* Thank you for clarifying the reference numbers and arranging for me to be contacted on both counts by email in future. You do not say if Farmhouse will be marked as listed on the project maps in future. Please can you confirm this. I would like my email and attachment to be added to the records in time to meet Deadline 6.	Manor Farmhouse (1049998) is included on **Figure A11.1.1 Designated Heritage Assets [REP4-123]** (page 5) and **Figure 11.2 - Designated Heritage Assets Assessed in the ES Chapter [REP4-145]** (page 5). Manor Farmhouse was fully assessed as a listed building impacted by the Project and details and the conclusions of this assessment work can be found in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. Manor Farmhouse is also considered in document **8.9.1 Applicant's Responses to First Written Questions (Revision A) [REP3-074]**. The Applicant is confident that the results of the assessment are proportionate and appropriate within the DCO framework. The Applicant has checked the Historic England entry[1] for the asset and the point is located correctly on Manor Farmhouse. Oak Barn to the south of the asset is not listed separately but as an outbuilding predating 1948 and located within the curtilage of Manor Farmhouse it is curtilage listed. The setting of a listed building is its surroundings, and the assessment has correctly considered the Oak Barn as part of this assessment.
REP6-226	Penny Lang	**Legal Opinion** This seems the right moment for a timely reminder of the obfuscatory behaviour of National Grid as noted by many, continually, over many years, to a frustrating extent; declared in the Opinion (at Para 7) of Lord Charles Banner KC for Pylons East Anglia on 10 April 2026 submitted at Deadline 3: "This sustained obfuscation of such key questions should be deprecated by the Examining Authority, and if it is continued, an adverse inference should be made" [This appears to mean that if they omit to give information, adverse inferences can be drawn that they are assumed to be in the wrong or hiding something] My comments - on the	The Applicant is grateful to all those who have engaged with the consultation and examination processes and takes the concerns raised about its approach seriously. The Applicant welcomes the opportunity to respond to those concerns. The Applicant does not accept the suggestion that it has sought to obscure information or avoid engagement with substantive issues. Throughout the development of the Project and during the Examination, the Applicant has provided extensive consultation, technical and environmental information to explain the Project, the alternatives considered, and the reasons underpinning the decisions taken. While stakeholders may disagree with some of those decisions or the conclusions reached, the Applicant's objective has consistently been to provide sufficient information to enable informed participation in the process and to engage constructively with the issues raised.

[1] https://historicengland.org.uk/listing/the-list/list-entry/1049998

Examination Library ID	Name	Matter	NG Response
		Written Submission on behalf of PEA by Bidwells, 6 July 2026 “Note on the Applicant’s Response to PEA’s Heritage Rebuttal (REP4-369)” As the ExA Panel themselves have stated, at the end of CAH3, on 24 June, NG needs to “Give substantive replies, not referring to other documents/hyperlinks”. This is a sentiment with which I entirely concur, the below follows this up. PEA have highlighted formally our views on the Applicant’s communications over the last four years. And it fits well with the Opinion above, on obfuscation by the Applicant. For four years, NG have barely listened, nor paid much attention to feedback. Now, through this Bidwell’s Note, NG’s lack of ability to respond adequately has come into sharp focus. I propose to keep this short and just list some of their phrases which I recognise in describing how NG responds, and with which we’ve been expected to engage, time and again: o They do not engage with the substance of the issues o They restate prior conclusions o They repetitively re-assert their approach is “robust and proportionate” o And “agree with Historic England” even though it is not confirmed o They consistently refer the reader to other documents or hyperlinks o This pattern repeated across every heading in the Pea response referred to above o They regularly cite dozens of separate documents within responses These phrases from NG, exposed by Bidwells on behalf of PEA ,are dispiritingly familiar, and we feel utterly helpless when trying to deal with and respond to them and their repetitive ineptness.	The legal framework that applies to this application is that set by the Planning Act 2008, which was specifically designed by Parliament for Nationally Significant Infrastructure Projects of this character. Under section 55(3)(e) of that Act, the Planning Inspectorate may only accept a DCO application if the applicant has complied with the pre-application consultation requirements in Chapter 2 of Part 5, including the section 47 duty to consult the local community. This application was accepted into examination by the Planning Inspectorate, and that acceptance necessarily involved the Inspectorate forming a view on the adequacy of the consultation undertaken. The Applicant relies on the fact that the Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. The Applicant is also conscious that the Gunning Principles, as endorsed by the Supreme Court in R (Moseley) v London Borough of Haringey, require that consultation occurs when proposals are at a formative stage, that sufficient information is provided to permit an intelligent response, that adequate time is given, and that the product of consultation is conscientiously taken into account. The Applicant's independent legal advice is clear that the suggestion the pre-application consultation is legally flawed is incorrect, and that when the statutory scheme, associated ministerial guidance and the Gunning Principles are applied in their proper context, the consultation meets or exceeds what is required. The Applicant understands that not everyone agrees with that assessment, and has read the opinions put forward on behalf of objector groups carefully and with respect. On the question of whether the Applicant has genuinely listened and responded to feedback: the Applicant allowed 8 weeks for each of the 2022 and 2023 non-statutory consultations, 15 weeks for the 2024 statutory consultation, and then carried out targeted consultations from January to April 2025 where significant changes arose following statutory consultation. Community and landowner engagement has been continuous, structured and iterative, encompassing two rounds of non-statutory consultation, statutory consultation from April to July 2024, and ongoing negotiations through submission and examination, with landowners contacted directly, provided with plans and materials, invited to events and offered meetings. That engagement produced concrete results. The Applicant took account of feedback through a formal change control process and made changes including alignment and pylon siting adjustments, refinements to order limits and land-take/interference, and access and mitigation measures, with targeted engagement carried out wherever proposed changes could materially affect individual interests. The Applicant acknowledges that not every suggestion received could be incorporated. Sometimes a requested change would have created difficulties elsewhere along the route or conflicted with technical, environmental or policy requirements. The Planning Act 2008 pre-application regime requires consultation on the proposed application and the land to which it relates, which necessarily assumes the applicant has formed a proposal to frame consultation, and does not impose a general requirement to consult on any and all alternative schemes that are not proposed. A decision not to accept a particular change is not the same as not listening, and the Applicant has documented its reasoning carefully. For landowners who have engaged directly without an appointed professional adviser, the Applicant's engagement has focused on clear and accessible information, explaining Heads of Terms and statutory powers in non-technical terms, distinguishing voluntary negotiations from the DCO process, allowing appropriate time, and advising that any landowner may appoint an adviser whose reasonable fees the Applicant will meet. On the specific question of heritage, which the Applicant understands is of particular concern to this IP: Historic England is a prescribed consultee under section 42(1)(a) of the Planning Act 2008, and the Applicant has engaged with Historic England throughout the pre-application process, including through non-statutory consultations in Spring 2022 and Summer 2023, statutory consultation in Spring 2024,

Examination Library ID	Name	Matter	NG Response
			targeted consultations in Spring 2025, and a sustained programme of technical meetings and documentation sharing. That engagement is documented in a Statement of Common Ground with Historic England. The Statement of Common Ground sets out areas of agreement on historic environment assessment, methodology, mitigation, viewpoints, and supplementary environmental information, demonstrating ongoing engagement rather than a single one-off exchange. The Applicant appreciates that the volume of material associated with a project of this scale does require some navigation, and has tried to ensure that key areas of agreement and remaining discussion are clearly signposted. Where matters have remained live into the examination, that reflects the proper process of iterative refinement rather than any unwillingness to engage. Finally, the Applicant wishes to address the concern that its responses lack substance and simply recycle previous material. The Applicant reviews all relevant representations received and either responds directly to bespoke comments or responds by thematic analysis, noting that many matters raised are often very similar to other feedback already addressed in responses. The Applicant recognises that this can feel unsatisfying to an individual who has taken the time to raise a specific concern, and regrets if signposting to other documents has felt less helpful. The reason for doing so is not to deflect, but because the examination material (including the application submission material, such as the Consultation Report and the Environmental Statement) contain detailed, substantive analysis of the issues raised, and duplicating that analysis in full in every response would not serve respondents any better. In conclusion, The Applicant developed its proposals and carried out consultation in accordance with statutory guidance and the relevant Gunning Principles, and directs those wishing to understand its detailed legal position on consultation adequacy to the Legal Opinions appendix of the Consultation Report, which addresses those questions. The Applicant has always, and remains, committed to engaging constructively throughout the examination, and welcomes any all questions that may help to clarify its position.
REP6-226	Penny Lang	**Colne Valley** The three independent Landscape Reports discussed at the recent ISH4, all emphasise that NtoT has the “high potential for widespread and significant harm” in the Colne Valley. Local councils also agree. I don’t understand how NG can dispute this. It is good that the ExA requested a response from NG, by D 6, regarding the closeness to Hines Close, and Church Grove, Aldham of Pylons TB54 and 55 It seems to me that the Colne Valley shares many of the Natural England criteria for a National Landscape. This could be a combination of factors, such as: • landscape quality, scenic quality, relative wildness, relative tranquility, natural heritage features and cultural heritage. NG’s Visual Impact Provision Project (VIP) (government granted scheme)“is to reduce visual impacts of electricity infrastructure in protected landscapes”. So, to this end, OHLs have been removed and replaced by underground cables in Snowdonia, Peak District, Cotswolds and Dorset. To avoid unnecessary expense and future inconvenience, it would seem sensible not to	The Applicant has responded above to similar concerns raised in REP6-175 by Aldham Parish Council.

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		build pylons in the first place when there are better alternatives. I would also like to endorse, among other excellent submissions, those from Pylons East Anglia and Aldham Parish Council, and the letter from our MP, Sir Bernard Jenkins, also to Deadline 6.	
REP6-224	Paul Lanham	We have grave concerns about the pylon development at [redacted] and are very worried about losing all our income i.e. tourism, cattle and fishing lake. If this goes ahead all will be lost. We would like yourselves if possible to visit [redacted] to understand our plight.	The Applicant acknowledges the concerns raised by the AP over the course of negotiations and following attendance at CAH2 and OFH4. The Applicant refers the AP to the letter response dated 18th June 2026 which confirms in writing that the Applicant continues to work with the IP's agent to gain understanding of potential losses and impacts to the farm. However further to the meeting with the AP's agent on 11th May 2026 and subsequent follow up email, the Applicant is still awaiting financial details from the AP / their appointed agent, in relation to the fishing lake, bio security requirements relating to the turkey business and supplemental feeding of the cattle in order to progress meaningful discussions regarding accommodation works to mitigate the impact to the businesses.
REP6-225	Pauline Lifton	I strongly object to the proposed works affecting [redacted], as they will have a direct and significant impact on our property, our health, and our quality of life. The proposed construction works are planned in extremely close proximity to our home. We are deeply concerned about the prolonged exposure to noise, vibration, dust, air pollution and heavy construction traffic, and the cumulative impact these will have on our physical and mental wellbeing. Despite these obvious concerns, we do not believe that the Applicant has properly assessed or addressed the health impacts on those living closest to the works. We are also extremely disappointed by the lack of meaningful engagement with affected residents. While National Grid has undertaken public consultation, this has not amounted to genuine consultation with those most directly affected. Our concerns have not been properly listened to or addressed, and we do not feel that our property or our wellbeing have been given adequate consideration in the development of the proposals. Our specific concerns include: • The direct impact on our home from construction activities taking place in close proximity. • The adverse effects of prolonged noise, vibration, dust and emissions on our health and wellbeing. • Increased heavy goods vehicle movements on [redacted], creating unacceptable safety risks and further reducing our quality of life. • Damage to the rural character of [redacted], creating unacceptable safety risks and further reducing our through road widening and engineering works.	*Impacts to health* The assessment of impacts on health and wellbeing is provided in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C].** The assessment has been completed in line with appropriate guidance (e.g. IEMA, WHIASU) and is both proportionate and robust. No significant impacts have been identified on physical or mental health and wellbeing as a result of the construction or operation (and maintenance) phases of the Project. The assessment acknowledges that community mental health and wellbeing can be impacted by changes to landscape and visual amenity, and assesses impacts during both the construction and operation phase. It is noted that impacts are likely to be experienced differentially by members of local communities according to factors such as where they live, or their outlook (those living in closest proximity to construction activities, or to Project infrastructure, may be more vulnerable to change). Although there is a link between visual change and health outcomes, this is not considered to result in a significant change. The assessment of impacts on mental health and wellbeing during the construction phase highlights the importance of community engagement during the pre-commencement and construction phases, providing local communities with mechanisms by which some measure of control may be experienced (a protective factor in mental health and wellbeing). To reinforce this, and to help overcome issues associated with anxiety caused by uncertainty, an additional commitment has been included within **7.2 Outline Code of Construction Practice [Revision G]** relating to preparation of a detailed Communication Strategy. Further detail relating to a complaints procedure has been included within **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision D].** An assessment of intra-project cumulative effects has been set out in **6.17 Environmental Statement – Chapter 17 [Revision B].** This assesses where several different effects resulting from the same Project (e.g. air quality, noise) have the potential to affect a single receptor. No significant effects relevant to health and wellbeing have been identified. Appropriate mitigation for various environmental effects during construction are set out in **7.2 Outline Code of Construction Practice [Revision G],** for example in relation to dust management. Further mitigation relevant to construction traffic is set out in **7.3 Outline Construction Traffic Management Plan [Revision F].** With regards to construction noise and vibration these would be subject to ongoing checks and mitigation selection as part of a range of commitments in **7.2 Outline Code of Construction Practice [Revision G];** principally NV01 to NV05. These also require that the detailed assessments, mitigation proposals, and monitoring and reporting proposals are submitted to and agreed by the relevant local planning authority prior to the start of works.

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		• Loss of trees, hedgerows and wildlife habitats that form an important part of the local environment. • Disruption to access for residents and emergency services during the construction period. The failure to properly consider less harmful alternatives, including the potential for temporary construction access directly from the A120, rather than routing construction traffic along an unsuitable rural road. While we recognise the importance of strengthening the electricity network, this should not come at the expense of the health and wellbeing of local residents. We do not believe the Applicant has demonstrated that these impacts have been minimised, nor that all reasonable alternatives have been fully explored. For these reasons, we ask the Examining Authority to give significant weight to the direct impact on our property and family, to recognise the inadequate consultation with those most affected, and to refuse the proposed works affecting [redacted] unless National Grid can demonstrate that there is no less harmful alternative and that robust measures are in place to protect the health, safety and wellbeing of local residents	*Impacts on highways* The Applicant notes the concern raised in terms of construction access impacts in the vicinity of the Respondent's property. The Applicant emphasises that alternative access approaches for the proposed EACN substation have been considered, and these are set out in Section 3.8.14 of **6.3 Environmental Statement Chapter 3 – Alternatives [Revision B]**. In line with the assessment set out in that document, the proposed construction access route for the EACN substation was preferred on the basis of preferable anticipated environmental, land, and construction impacts in comparison with the identified alternatives. The Applicant further notes the concern raised with respect to construction of the proposed highway mitigation on the EACN access route along Bentley Road and Ardleigh Road. This is set out on Sheets 14 and 15 of **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section C [REP4-172]**. Outline design for this mitigation has been developed and assessed through a Road Safety Audit process overseen by Essex County Council as the Local Highway Authority, in line with the approach set out in Section A.3 of **7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]**, and the Applicant is engaging with Essex County Council around further details of this in line with the positions set out in Item 3.11.84 of **5.9.3 Statement of Common Ground – Essex County Council (ECC) incl LLFA and Highways [Revision F]**. The Applicant notes that traffic management for the construction of this mitigation will be provided in line with the approach set out in Section 5.8 of **7.3 Outline Construction Traffic Management Plan [Revision F]**, which will include engagement with impacted parties – including emergency services – and maintenance of access to and from impacted properties during construction of the mitigation. The Applicant has assessed the impact of the additional HGVs travelling on Bentley Road in **7.11 Transport Assessment [Revision B]**. Site 39 A120 Harwich Road/Bentley Road junction has been modelled and the results of the junction capacity assessment are presented in **7.11 Transport Assessment [Revision B]**. The modelling was undertaken with the proposed mitigation of the widening of junction bellmouth and lengthening of merge taper onto A120 NB mainline. It was identified that the junction would operate within theoretical capacity in the AM Peak hour, and in the PM Peak hour, the junction would operate within practical with a slight increase in delay and queue length from 2 to 9 passenger car units. As noted in Section 7.16 of **7.11 Transport Assessment [Revision B],** a shared pedestrian/cycle route has been proposed on Bentley Road (Link PAR 30) as part of the embedded mitigation measures. A suitable crossing point has been provided as part of the design of the shared pedestrian/cycle route therefore no further mitigation is proposed at this road link. Additionally, the speed limit on Bentley Road is to be restricted to 30mph and 40mph, captured in **3.1 draft DCO [Revision G].** *Consultation* The Applicant is grateful to all those who have engaged with the consultation and examination processes and takes the concerns raised about its approach seriously. The Applicant developed its proposals and carried out extensive pre-application consultation in accordance with statutory guidance, the requirements of the Planning Act 2008, and the relevant Gunning Principles. The Applicant's independent legal advice is clear that when the statutory scheme, associated ministerial guidance and the Gunning Principles are applied in their proper context, the consultation meets or exceeds what is required. The Applicant understands that not everyone agrees with that assessment. The Applicant took account of feedback through a formal change control process and made changes including alignment and pylon siting adjustments, refinements to order limits and land-take/interference, and access and mitigation measures, with targeted engagement carried out wherever proposed changes could materially affect individual interests. The Applicant acknowledges that not every

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			suggestion received could be incorporated. Sometimes a requested change would have created difficulties elsewhere along the route or conflicted with technical, environmental or policy requirements. The Applicant has always, and remains, committed to engaging constructively throughout the examination, and welcomes any questions that may help to clarify its position. *Air Quality* The construction dust assessment is in **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results ([Revision B].** The assessment followed industry best practice guidance set out in the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction. Without mitigation there would be a negligible effect from dust beyond 250m of the Order Limits. The assessment concludes that with the appropriate implementation of dust mitigation which is set out in **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]** there would be no significant effect from dust on sensitive receptors within 250m. There is also a function in the mitigation which allows for a new dust assessment to be undertaken at each work package to account for the detailed development of design and construction activities that may occur in close proximity to receptors.
REP6-195	Dennis Watts	The full length of low height pylons numbered TB136 to TB142 between Little Waltham and Great Waltham, Essex, should not be altered. I am a resident of Little Waltham who would be seriously and very negatively affected by the proposed route of pylons. As I have previously explained, I strongly object to the proposed cables and pylons across East Anglia and am in favour of upgrading to more efficient cables on existing pylons, an undersea route or under grounding. However, the lower height pylons proposed by National Grid, including ALL the pylons numbered TB136 to TB142 would, in my opinion, certainly be preferable to full height 50 metre pylons. Unfortunately there has been a complication caused by some requests to move one low height pylon away from the road, between the two villages. It appears that National Grid may have overreacted to this and may have taken the opportunity to propose to reinstate three full height pylons, in the area, in response to this request. I can understand that a few people may have objected to having a low height pylon close to the road. However, I doubt whether they expected that National Grid might take the opportunity to reinstate three very dominating and intrusive full height pylons in place of the much more preferable lower height pylons proposed for the area. I would much prefer the original plan for all the low height pylons and not to have three much higher pylons, even though one low height pylon may be rather close to the road.	The Applicant has responded to similar concerns raised in REP6-231

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		On checking currently available maps of the pylon route that I can find, there is no indication of the possible change back to full height pylons at three locations between the villages. As no change is shown I wish to claim strongly that any change to the originally proposed low height pylons should not therefore go ahead. Lower pylons would very significantly reduce the impact on the area compared with full height pylons. As they are not shown on the maps currently available, I hope National Grid has decided against the requested change and that there will be no further complications. If on the other hand, the above change is planned, there should be publicity about it and a consultation. I only found out about it by questioning someone who made a statement in our parish magazine about a pylon being moved without mentioning the likely consequences of three full height pylons. I have discovered the full situation only just in time for commenting by the deadline and I suggest other potentially affected people would not have been aware of it especially as the maps I (and very likely they) can find do not show the changes that may be proposed	
REP6-190	Councillor Sara Naylor	I am the Colchester City Councillor for Lexden and Braiswick ward and the Essex County Councillor for Constable Division. I wish to contribute as an elected member of bodies determined to be statutory consultees for these areas which include the Dedham Vale, the Colne Valley and the Roman River Corridor. I agree that Dedham Vale should be seen as a continuous landscape that is naturally connected to the Colne Valley and the Roman River Corridor. I made this point in my submission to the National Grid public consultation in 2024. I am resubmitting my 2024 document here that makes a strong case for the Colne Valley to be considered a valued landscape and agree that it shares significant features of the National Landscape at Dedham Vale. The applicant made the case for special treatment of these valued features. Policy NPS EN-5 does not require that special treatment be reserved for National Landscapes, so the argument is therefore made by the applicant that the same exceptional treatment is applied to the Colne Valley. I wish to register my support for the content of the letter submitted by Sir Bernard Jenkin MP dated 7 July 2026 (interested party number FA80560AF). The points made are ones that I wish to make too. I also support the submissions of the parish councils in West Bergholt and Aldham.	The Applicant has responded to similar concerns raised by Aldham Parish Council at REP6-175.

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		I also support the submissions of Pylons East Anglia submission to Deadline 6. The landscape assessment commissioned by Pylons East Anglia demonstrates that the Colne Valley meets the six criteria that a landscape must meet to be considered for AONB status. Furthermore I draw the Examining Authority to my submission referred to earlier, page 4 onwards is directly relevant to the evidence that was heard w/c 22 June 2026. My submission to the public consultation in July 2024 requested that the Applicant carry out a landscape assessment. I note that three landscape assessments have been carried out of the Colne Valley and all agree with my original point that the Colne Valley is exceptional and should be treated as such by the Applicant. I also wish to point out that it would not be a reasonable alternative to reroute the pylons towards West Bergholt as noted in my 2024 consultation submission [Cllr Sara Naylor, 25 July 2024, p4-5] I note: "It is important to note that, although not proposed in this consultation, it would be inappropriate for the pylon route to be moved further south towards West Bergholt's modern village centre as it would contravene planning principles set out by the Holford Rules. These rules require the pylon route to avoid residential areas and open plateaus such as the farmed fields that border the Essex Way as it rises from near medieval Cooks Hall, Grade II* listed, out of the Colne Valley towards 18thC Bergholt Hall, Grade II* listed, and the exceptional Church of St Mary, Grade I listed. The church features an original northern wall dated to 1,000AD which evidences signs of local worship on the site for over 1,000 years which continues to this day. "The Essex Way then continues past the Hall before it turns towards the modern centre of West Bergholt physically connecting the two centres, across open farmland, which are already intrinsically linked in the minds of residents. This pathway is in constant and daily use by residents enjoying the amenity of the landscape between and beyond the modern heart and the historic locus of the village, demonstrating its significance to local residents." I urge the Examining Authority to give particular consideration to this point when reflecting upon the further comments received in Deadline 6.	
	Alison Farmer Associates Landscape Report	**Introduction and Summary 1** The North-West and South-West of Chelmsford Parishes Group ('the Parishes Group'/'the Group) is an alliance of	The Applicant has provided a recent response in item number 8.3 of document **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].**

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	9 parish councils: Broomfield, Chignal, Great Waltham, Highwood, Ingatestone and Fryerning, Little Waltham, Margaretting, Roxwell and Writtle. 2. Following discussion at ISH2, the Parishes Group expected the Applicant to make a full written response to the AFA Report. We became concerned when no response was forthcoming at deadline 4 or 5; and when the Applicant's Summary of its Oral Contribution omitted reference to such a response. We mentioned this briefly in our [REP5-260]. 3. We contacted the Case Team in order to establish beyond doubt what was said at ISH2. They advised us to put the details into a further rep at Deadline 6. 4. The Parishes Group therefore has 2 concerns about this matter: - - That the Applicant seems unaware of its commitment to the ExA at ISH2 to respond in full; That, with the end of the Examination approaching, there has still been no full response to an expert report which the Inspector noted as requiring one. **Discussion at ISH2** 5. The relevant discussion took place within Item 8.3, Great and Little Waltham. It is a little complicated, as the discussion was spread over Part 5 of the Recording. The main points are as follows: At 4.45 mins in, the Inspector raised a point from the Report and asked if the Applicant's representative was familiar with it. She thought she was not. He emphasised (at 7.35 mins in) the need to study and respond to the Report unless the Applicant had already done so. At 20.20 mins in, the Applicant's representative came back in and said that it had responded to the Report, referring to [AS-089]. At 53 mins, the Parishes Group representative emphasised our position that [AS-089] does not properly respond to the Alison Farmer Report, merely acknowledging its existence At 54.50 mins, the Inspector referred this point back to the Applicant's barrister who replied that its response to this issue will be in writing; and ' in terms of the Farmer Report you've asked us a specific question in relation to it, we will ensure that we reply to it in full.' 6. It is this last important point that has either been overlooked by the Applicant; or it has reverted to its earlier position without explanation. **Applicant's Response to Relevant Representations [AS-089] 7.** If the Applicant has reverted and now says that [AS-089] is a full response, the Parishes Group would emphasise again that this is not the case. Indeed, as [AS-089] is the Applicant's response to Relevant Representations, it cannot be, as the AFA Report was	*Response to Introduction and Summary 1:* In response to the Alison Farmer Associates' report, it is noted that the May 2025 report references information presented in the 2023 Statutory Consultation Feedback Report, Design Development Reports (2023 and 2024), the Applicant's Preliminary Environmental Information Report (PEIR) from 2024. The DCO Application was submitted in August 2025 and the accompanying Environmental Statement (ES) and relevant assessments present additional information gathered and developed since the PEIR. As such, the findings in the May 2025 Alison Farmer Associates' report are based on information taken from preliminary Project studies and not the actual application for development consent. The Alison Farmer Associates' report is an appraisal (rather than a detailed assessment) and provides a review of the landscape and heritage findings in the PEIR. The report provides information and observations on local landscape character areas and heritage assets, likely sensitivities and effects, opportunities for mitigation, with reference to neighbourhood plans, including Broomfield, along with an appraisal of route corridors relating back to earlier stages of the Project evolution. The report notes that it does not constitute a full heritage or landscape and visual assessment and judgements are therefore broad brush but is sufficiently detailed to provide a reasonable understanding of the likely impacts and to enable route options to be compared. The report's findings mention gaps in information, which the Applicant assumes are as a result of the report referencing preliminary environmental information rather than final Project baseline studies and assessments presented in the Environmental Statement (ES). The report concurs with the ES findings that there will be significant heritage and landscape effects, with potential for effects on landscape character, heritage assets, views including from long-distance walks, noting that the Holford Rules should be adhered to. The landscape and visual impact assessment presented by the Applicant in document **6.13 Chapter 13 – Landscape and Visual [Revision B]** was informed by a range of landscape studies, including those mentioned above (as referenced in the ES). In addition, it was further informed by repeated survey/site work and desk top research, along with whole team discussions and workshops related to detailed iterative design, and consultation. The information provided in the Alison Farmer Associates' report, whilst informative, would not alter the findings of the LVIA, noting that both identified significant effects in proximity to the Project. With regard to compliance with the Holford rules, the Applicant has set out a previous response as noted in item number 8.3 of document **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].** The Applicant appreciates the submission of the information, and reiterates that relevant documents such as the 2019 *Broomfield Neighbourhood Plan Landscape Appraisal*, the 2021 *Broomfield Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views*, prepared by Alison Farmer Associates contributed to the awareness of landscape and visual matters. With regard to the routeing of the Project, and the appraisal of options presented in the Alison Farmer Associates' report, the Applicant again appreciates the submission, and reiterates that overall there are technical constraints that make the route preferred in the Alison Farmer Report (a close parallel route to the east/south of Chelmsford) less preferred when all considerations (including technical, economic and environmental) are taken into consideration. It may be possible to achieve a route similar to that suggested in the report, but only through extensive levels of mitigation such as potential tunnelling, that would rule this out as an alternative as it would be incompatible with National Grid's duties most notably under the Electricity Act to be economic and efficient. The Applicant has provided previous responses including in **8.4.12 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-194]** in Item No 8.6 and in document **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114].**

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		not submitted until Deadline 1. Our Relevant Representation simply says that it had been produced and would be submitted. 8. It is therefore not surprising that [AS-089] merely acknowledges the existence AFA Report. At one point, it states that 'This (the AFA Report) is responded to in our response to item 3 below', but there is no such response (nor even an item 3). There is only one further passing reference to it. Conclusion 9. At ISH2, the Inspector rightly noted the importance of a full response to the AFA Report. The Parishes Group would be grateful to the ExA if it were minded to clarify this matter such that a full response from the Applicant is forthcoming. 10. The Parishes Group believes that Examination would be best served if the Applicant responds in time for the Group to comment on that response. This would mean that the Applicant would need to provide the full, written response at Deadline 7 at the latest.	*Response to Discussion at ISH2:* For clarity, in regard to the discussion at ISH2, the transcript taken from document **Transcript of Issue Specific Hearing 2 (ISH2) - Day 2 - Part 5 [EV9-018]** notes that at 5:35 the Alison Farmer Associates landscape report was initially raised with the Applicant's heritage consultant. The landscape team had provided the response to the report, hence the initial uncertainty about the report. At 20:23 the Applicant's landscape representative confirms that the landscape team had provided a response in document **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089].** Please see above for a full response to the Alison Farmer Associates' report. *Response to Applicant's Response to Relevant Representations [AS-089] 7.* Please see above.
REP6-170	Thurrock Council	Comments on the updated Outline Landscape and Ecological Management Plan (OLEMP) 1.1 The Council has the following comments on the updated Outline LEMP [REP5-157]. 1.2 On a positive note, the Council welcomes the inclusion of the text "a diverse range of species will be used to minimise overall losses from drought or pests and diseases;" in reference to tree and hedgerow planting as a diverse range of species will also benefit local wildlife. 1.3 Additionally, in section 9.5.2 regarding the use of green hay the Council approves of this inclusion. Although, the Council would like this flagged as "of local providence" to ensure it fulfils its objective of "acquiring seed of local provenance." 1.4 However, the Council is concerned regarding point 10.2.1 regarding "weed free strip either side of the hedgerow through chemical and/or mechanical control." This can be dealt with further in the LEMP, but the Council would require some additional information on what is considered a weed in this context as ground flora is an important part of hedgerows so just the removal of all species would not be beneficial. Additionally, details on the chemical methods should be detailed in the LEMP to make sure they are appropriate.	The Applicant welcomes the Council's comments on the recent updates to **7.4 Outline Landscape and Ecological Management Plan [REP6-084]** submitted at Deadline 6 and can confirm that further detail will be provided in the final Landscape and Ecological Management Plan submitted to and approved by the relevant local planning authority under Requirement 4 of the Draft DCO. The latest version of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes updates to paragraph 10.2.1.
REP6-170	Thurrock Council	**Essex Place Services (Archaeology) Comments on behalf of Thurrock Council** Place Services is providing a response to the documents submitted at Deadline 5 with regard to archaeology for Essex County Council (ECC) and on behalf of Colchester, Tendring, Chelmsford, Basildon, Brentwood and Thurrock planning authority areas.	*Comments on Draft DCO* The Applicant notes ECC's comments regarding the clarity of the drafting in paragraphs (1) to (3) of Requirement 5 and has updated **3.1 Draft DCO [Revision G]** to switch the order of paragraphs (2) and (3) to create a more logical flow. Please refer to the Applicant's response to Suffolk County Council regarding the drafting of Requirement 5 more generally.

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		3.1 Comments on Draft DCO (3.1 Draft DCO (Tracked) (Final Issue E) (REP5-061) 2 3.1.1 The revised DCO wording for Requirement 5 (Archaeology) has included a new part (6) which satisfies the recommendations requested by ECC to ensure the delivery of an adequate programme of post-excavation works and publication. The wording of Requirement 5(6) is considered acceptable. 3.1.2 The re-worded sections (parts 1 to 3) have tried to incorporate the various requests of the relevant planning authorities to provide suitable re-wording for the DCO. However the result is that the new proposed wording is confusing and does not reflect the proposals put forward by ECC which was to provide a distinction between the undertaking of the archaeological evaluation works and the subsequent mitigation works. This was to facilitate a clear process for the discharge of condition procedures. 3.1.3 The DCO wording has been discussed previously with the relevant county archaeological officers, comments were prepared for the Second Hearing regarding Requirement 5 however they were not delivered during the Hearing. It is recommended that the wording provided by Suffolk County Council for the Hearing be adopted rather than repeat or provide alternatives at this stage of the application. Following their rationale would lead to fewer subsections and ensure greater clarity for discharge of conditions. 3.2 Comments on the Outline Archaeological Mitigation Strategy/Outline Written Scheme of Investigation (OAMS/OWSI) 3.2.1 A revised version of the outline archaeological mitigation strategy and outline written scheme of investigation (OAMS/OWSI) was provided at Deadline 5 (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Tracked)(Final issue B) (REP5-161). A number of changes have been made in line with our recommendations. There remains only a few outstanding issues, detailed comments on which have been provided direct to the archaeological consultants as requested. The remaining issues relate to the geoarchaeological investigations, the trial trench proposals and proposed mitigation. 3.2.2 Geoarchaeology 3.2.2.1 There is a lack of sufficient detail on the potential methodologies that could be employed as part of the geoarchaeological assessment and mitigation. 3.2.2.2 Currently the OAMS/OWSI states: 5.3.24 “The methodology by which the characterisation of deposits with palaeoenvironmental/geoarchaeological potential is	*Comments on 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]:* The Applicant has engaged directly with the archaeological advisor for Essex County Council and Thurrock Council to agree the updates in relation to these matters. 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. *Comments on Phase 2 Archaeological Evaluation Trenching:* The Phase 2 trench plans provided directly to the archaeological advisors to the LPAs account for all areas of physical impact. Certain elements of construction works, such as pulling locations, do not require any activities that may impact archaeology e.g. they would not require any soil strip to create working areas. The design information shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]** was provided in GIS format directly to the archaeological advisors to the LPAs to inform their review of the Phase 2 trench plans. *Comments on Mitigation Areas/Detailed WSIs:* The documents submitted have been shared with the archaeological advisor for Essex County Council and Thurrock Council and comments were received from them at the Archaeology Working Group meeting held on 1st July 2026. Amendments in light of these comments have been incorporated into **documents 8.21-8.24**, which have been resubmitted at Deadline 7 and therefore should be considered to have addressed concerns from Essex Place Services. The Applicant has requested a meeting with Essex Place Services, via email on 16 June 2026, but this has not yet been arranged, and to date no other comments have been received from Essex Place Services on the proposed mitigation areas. It is incorrect to state that it is ‘inadvisable to secure mitigation at this stage of the application’. Mitigation has been secured at this stage of the application on a number of other consented DCOs, including Bramford to Twinstead (National Grid project) in Suffolk, Longfield Solar Farm in Essex, the Lower Thames Crossing in Essex, Kent and Havering, the A428 Black Cat to Caxton Gibbet in Bedfordshire and Cambridgeshire, and Sunnica Energy Farm in Suffolk and Cambridgeshire.

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		achieved will be set out in the relevant DWSI and may include, but not be limited to, mechanical test pitting within archaeological trial trenches and the monitoring of G.I. works" 3 3.2.2.3 Requirement 5 of the DCO states that the detailed WSIs (DWSI) need to be in accordance with the OAMS/OWSI. This would necessitate the incorporation of a full range of geoarchaeological investigations that may be required as mitigation in sufficient detail in the OAMS/OWSI. No details on alternative methodologies are provided within the OAMS/OWSI document therefore there is no basis or standards set for the techniques which would be expanded upon in the detailed WSI's. 3.2.2.4 Until further geoarchaeological assessment is completed and the impacts understood the most appropriate geoarchaeological methodology for characterisation of the deposits with palaeoenvironmental/geoarchaeological potential is not fully realised therefore the most appropriate mitigation technique has not been determined. 3.2.2.5 The main methodology proposed for geoarchaeological mitigation is borehole investigation, adequate detail for this methodology is provided within the OAMS/OWSI. 3.2.2.6 In other areas of the scheme where impact may be deeper, such as SUDS, undergrounding of cables or HDD drill pits, a more suitable methodology may be geoarchaeological test pits or geoarchaeological trenches. These methods should allow more suitable recording of geoarchaeological deposits such as buried soils and palaeolandsurfaces that would not necessarily be deeply buried and may have a substantial lateral extent. For the area of the river crossing a geoarchaeological trial trench may be more appropriate as mitigation as this would allow investigation of the full site stratigraphy over a wider area and allow concurrent investigation of potential archaeological remains. It is acknowledged that any deposits of high significance that are located at a significant depth would need to be investigated through borehole survey. 3.2.2.7 The agreement of the OAMS/OWSI within the determination period is critical to the undertaking of appropriate and timely archaeological and geoarchaeological mitigation post consent. For the OAMS/OWSI to be considered as a comprehensive outline strategy for geoarchaeological investigation it should include a wider range of potential geoarchaeological methodologies that could be required as mitigation for the scheme.	

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		3.2.2.8 At present the methodology for geoarchaeological assessment and mitigation is vague and the OAMS/OWSI does not incorporate the full range of geoarchaeological investigations that could be required as mitigation. The OAMS/OWSI has not been approved and is not yet considered adequate as a control document. 3.2.3 Archaeological evaluation trenching 3.2.3.1 The principles and scope of the Phase 2 trial trench evaluation methodology have been agreed previously in discussion with the archaeological consultants. The location of the trenches has been provided directly as digital data and is currently under review. It was previously recommended that the OAMS/OWSI should only identify the general areas for Phase 2 trenching within the Red Line Boundary that would require evaluation due to potential design changes which may impact the 4 location of the proposed trial trenches. Detailed Phase 2 trenching has been submitted for approval, the trenching should include all areas where project impacts have been identified, including (but not limited to) pylon bases, access roads, SUDS, drainage, pulley locations etc. The trial trenches should be located to target these areas of identified impact as well as any potential archaeological features identified through geophysical survey and/or aerial photography. To assess the proposed trial trench locations the most up to date design information needs to be made available to determine areas of impact. Once this information is provided the trial trench locations can be reviewed. The results of the review will be reported back to the archaeological consultant directly. 3.2.4 Mitigation Areas 3.2.4.1 A number of documents for archaeological mitigation have been submitted at Deadline 5. These include Volume 8: Examination Documents (June 2026): • 8.21 Detailed Written Scheme of Investigation – Mitigation areas 124, 136 (a & b), 137, 138, 141 & 142 Final Issue A (REP5-220) • 8.22 Detailed Written Scheme of Investigation – Mitigation areas 126, 128 (a, b & c) & 140. Final Issue A (REP5-221) • 8.23 Detailed Written Scheme of Investigation – Mitigation areas 109, 110, 111, 112 (a & b) &139. Final Issue A (REP5-222)	

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		• 8.24 Detailed Written Scheme of Investigation – Mitigation areas 113 (a & b), 114 & 115. Final Issue A (REP5-223) 3.2.4.2 The documents submitted are not acceptable in their current form, further information has been requested directly to facilitate full consideration of the mitigation proposals. The sites proposed for mitigation have not yet been discussed or approved by the archaeological advisor and there has been limited time since submission to consider these documents. It is considered inadvisable to secure mitigation at this stage of the application due to time constraints.	
REP6-162	ScottishPower Renewables (UK) Limited, East Anglia ONE Limited and East Anglia THREE Limited	In the SPR Parties' Deadline 5 submission [REP5-203], we noted that the Statutory Undertaker Tracker (the most recent version being REP5-267) stated that there are no SPR owned plots affected by compulsory acquisition and that this was incorrect as SPR owns a number of plots identified in the Book of Reference [REP5-072] as Class 1 land ("Compulsory Acquisition of land"). We have since realised that the Statutory Undertaker Tracker is unclear, and that the reference to SPR in the rows for EA1L and EA3L has caused some confusion and should be removed as SPR are not statutory undertakers for this Project for the purposes of section 127 of the Planning Act 2008, whereas EA1L and EA3L are. The SPR Parties have raised this point with NGET and asked them to remove reference to SPR within these rows to avoid any further confusion.	The Applicant notes the clarification provided by the SPR Parties regarding the status of ScottishPower Renewables (UK) Limited (SPR). The Applicant understands that the reference to SPR within the relevant entries of the Statutory Undertaker Tracker may have caused confusion, given that SPR is not a statutory undertaker for the purposes of section 127 of the Planning Act 2008, whereas East Anglia ONE Limited and East Anglia THREE Limited are. The Applicant has reviewed this point with the SPR Parties and will amend the relevant references within the next revision of the **8.7 Statutory Undertaker Tracker [Revision F]** to improve clarity and avoid any further misunderstanding.
REP6-142	British Pipeline Agency Limited as agents for United Kingdom Oil Pipelines Limited	We write further to the representations and submissions made on behalf of BPA / UKOP to date including RR-0413, PDA-011, AS-086, REP1-235 – 238 (inclusive), REP3-121 and the oral submissions made by Fieldfisher on behalf of BPA / UKOP at CAH1. **Update** While BPA / UKOP do not object to the Project in principle, they remain unable to support the draft Order in its current form until their concerns relating to UKOP's critical national infrastructure fuel pipeline are fully addressed and suitable protections are secured (whether on the face of the Order or by private agreement). BPA / UKOP appreciate the Applicant's constructive engagement and ongoing efforts to agree contractual protections for the Pipeline, with the aim of reaching a settlement as soon as possible so that the objection can be withdrawn. **Protective provisions and contractual protections** Subject to confirmation by the Applicant, the parties have today agreed a form of protective provisions for the benefit of UKOP and in relation to the Pipeline.	An asset protection agreement with BPA//UKOP has been agreed and is in the process of being executed by the Applicant and BPA/UKOP. As this has not been dated before Deadline 7, agreed protective provisions for the benefit of BPA/UKOP are included in the Order at Deadline 7. The parties have agreed that these will be removed from the Order at Deadline 8 provided that the agreement is in place by that date. Once the agreement is in place, BPA/UKOP will withdraw their objection.

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		Fieldfisher is the trading name of Fieldfisher LLP a Limited Liability Partnership registered in England and Wales (registration number OC318472) and is authorised and regulated by the Solicitors Regulation Authority (SRA number 441075). A list of its members and their professional qualifications is available at its registered office, Riverbank House, 2 Swan Lane, London EC4R 3TT. We use the term partner to refer to a member of Fieldfisher LLP or an employee or consultant with equivalent standing or qualifications. 2.2 In parallel the parties continue to engage and make progress in seeking to agree in relation to the Pipeline by way of a private side agreement in respect of which substantial progress has been made and the agreement is almost in a final form. However, to date, this side agreement has not been executed by the parties. 2.3 2.4 2.5 The parties have therefore agreed that, in the event that the abovementioned private side agreement is not agreed and completed by Deadline 7 of the Examination (21 July 2026), the Applicant will submit the agreed form of protective provisions for the benefit of UKOP for inclusion on the face of the Order as part of its submission. In the event that the Applicant does not (for whatever reason) submit the form of protective provisions agreed today at Deadline 7, BPA / UKOP will submit the same to the Examining Authority at Deadline 7. For the avoidance of doubt, it is hoped that the private side agreement referred to above can be agreed and completed in advance of Deadline 7. If that occurs, the parties do not propose submitting any protective provisions for the benefit of UKOP to the Examining Authority. While we remain optimistic that a negotiated settlement can be concluded in the very near future. However, given the critical nature of the infrastructure in question, BPA / UKOP are compelled to reserve the right to make further representations during the examination process and (if necessary, change) the nature of their objection if that is not the case.	
REP6-192	D N Grady and Sons Ltd	Submission ID: I write on behalf of D N Grady and Sons Ltd ("the Landowner") to provide a further update regarding the Landowner's continuing objection to the proposed overhead electricity transmission infrastructure crossing a significant area of the holding. Update position Following the submission made at Deadline 4, a further meeting was held on 23 June 2026 between the Applicant, (acting on behalf of the Applicant) and Norfolk land agents representing landowners, to continue negotiations regarding the proposed Heads of Terms. Whilst some positive progress has been made, there remain a number of	The Applicant notes that discussions regarding Heads of Terms remain ongoing. The Applicant welcomes the acknowledgement that progress has been made through recent negotiations and remains committed to securing agreements by negotiation wherever possible. Engagement with the Landowner and their representatives has included multiple meetings, site visits and ongoing Heads of Terms discussions, which continue to progress. The Applicant will continue to work with the Landowner to address land-specific accommodation matters and to identify reasonably practicable measures to reduce impacts on the farming business. The Applicant does not agree that the proposed land take, pylon siting or construction arrangements would result in unacceptable impacts on the viability of the holding. The alignment and pylon locations have been developed following environmental, engineering and land use assessments, and pylons have been positioned as close to field boundaries as reasonably practicable where technically feasible.

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		fundamental issues that have yet to be resolved before generic Heads of Terms can be agreed. Thereafter, detailed site specific provisions will still need to be negotiated and agreed. The Landowner's principal outstanding concerns remain: The extent of the permanent and temporary land take required for the proposed development; The siting of pylons and supporting infrastructure, particularly the need for structures to be positioned within field boundaries and other locations that minimise disruption to agricultural operations; The continuing impact of the proposals on the efficient operation, viability and future management of the farming business. To date, the Landowner has not received any substantive response or satisfactory update from the Applicant on these fundamental matters. Engagement with UK Power Networks ("UKPN") The draft Development Consent Order ("DCO") promoted by the Applicant includes powers relating to UKPN. However, there remains a significant lack of clarity regarding the precise nature, extent, location and justification of the proposed UKPN works affecting the Landowner's interests. Whilst reference has been made to the rerouting of existing infrastructure to facilitate the Norwich to Tilbury Project, no detailed information has been provided in relation to the specific works proposed on, or affecting, the Landowner's land The Landowner received no communication from UKPN, nor from its appointed agent introductory meeting was held via Microsoft Teams on 23 April 2026. That meeting was attended by , until an on behalf of UKPN and and from Savills on behalf of the Landowner. The meeting was introductory in nature and did not provide the detailed information required by the Landowner to understand the implications of the proposed works. Since that date there has been no further meaningful engagement by UKPN nor their agents, meeting is now scheduled to take place on 17 July 2026, involving representatives from UKPN, . A site , Savills and the Landowner. Notwithstanding that forthcoming meeting, the current position remains that UKPN is seeking extensive powers over private land without having adequately engaged with the Landowner or provided sufficient information regarding the impact of its proposals. Engagement Aside from the meeting referred to above concerning Heads of Terms, there has been no further meaningful engagement by either the Applicant or UKPN. The Landowner finds this lack of engagement surprising and deeply concerning given: The significant and long-term impact the proposals will have on the farming business; The scale of the proposed	Temporary working areas would be reinstated following construction and any acquisition of land or rights, together with any demonstrated loss arising from the exercise of the Order powers, would be compensated in accordance with the Compensation Code. The Applicant will continue to engage with the Landowner regarding detailed accommodation, access, soils, drainage and reinstatement matters as the Project progresses. In terms of the pylon positions on the APs land, the position of RG28 is restricted by virtue of it being an angle pylon to facilitate the necessary change of direction. Moving this to the field boundary to the east would change the alignment to the south-west to route very close to the residential properties on Hapton Road. To move it to the boundary to the west would take it too close to the road, where crossing protection work areas are required for scaffold during stringing activities. This pylon is also a conductor pulling position and therefore room around it is needed for stringing. Pylon RG27 has already been positioned such that pylon legs will be adjacent to the boundary on the south-western side of the pylon. The UKPN works are required to divert underground the existing wood poles and overhead line across the APs land to ensure safety electrical clearances are maintained. The Order Limits are slightly wider on this APs land due to the RG overhead line works including conductor stringing area, the UKPN diversion works required and the stone laydown area proposed to the west of pylon RG28.

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		infrastructure crossing productive agricultural land; The extent of the compulsory acquisition and rights powers being sought; and The requirement under the Planning Act 2008 framework for applicants to demonstrate a compelling case in the public interest for the acquisition of private rights and interests. The Landowner remains willing to engage constructively. However, meaningful progress cannot be achieved in the absence of detailed information and genuine engagement from those seeking powers over the Landowner's property. Conclusion The Applicant submitted its application for a DCO on 29 August 2025, including powers for compulsory acquisition and the acquisition of rights over substantial areas of the Landowner's holding. Despite the passage of considerable time, neither the Applicant nor UKPN has provided sufficient information or justification to support the extent of the powers sought. There continues to be a lack of essential information regarding both the Applicant's proposals and the proposed UKPN works. Furthermore, meaningful engagement is still limited and insufficient to address the substantial impacts that the proposed development would have on the farming business. Accordingly, in these circumstances, the Landowner considers that the proposals, as currently presented, remain unjustified insofar as they affect the Landowner's land and interests. Written by MRICS FAAV FALA	
REP6-210	Joanne Lesley Elliott	The Applicant has applied for permission to undertake major preparatory works in anticipation of planning permission being granted. This seems wholly inappropriate and should be refused. Irreparable damage will be caused. Furthermore, National Grid might seek to bring costs incurred in the preparatory work into account for a favorable decision.	To support the phasing of construction, the Applicant intends to submit separate planning applications to local planning authorities for some small, localised enabling works. This is a normal approach for many major infrastructure projects. As part of these applications, plans will be included to reinstate any work we carry out if the DCO is not granted. The Applicant previously consulted on these works while we developed our proposals for the Norwich to Tilbury project. No new or additional works are proposed beyond those set out in the DCO application.
REP6-205	Innova Renewables Limited	Submission ID: SFF5BC578 Dear Examining Authority We write on behalf of Innova Renewables Limited (Innova) to provide you with an update on progress between Innova and National Grid (NG) in respect of the interfaces relating to Innova’s projects at Parkgate and Hall Farm. Parkgate Innova has continued to engage with NG regarding a Statement of Common Ground (SoCG). Innova is working towards a signed version being submitted at Deadline 7. Failing that, by the close of the Examination on 10th August. The parties are now discussing Heads of Terms for a legal agreement to manage the interfaces between the projects and to confirm NG's planned project changes, which are set out in the draft SoCG submitted at deadline 4, and	**Innova Park Gate** The Applicant notes that discussions with Innova Renewables are ongoing and positive. The parties have agreed a number of key matters through the Statement of Common Ground, including: • installation and operation of solar panels beneath the overhead line; • appropriate overhead line clearances to the consented solar development; • relocation of pylon TB94 outside the consented solar development boundary; and • ongoing cooperation to minimise construction and operational impacts. The remaining matters principally relate to detailed interface arrangements and the progression of Heads of Terms and a legal agreement between the parties. The Applicant continues to engage constructively with Innova Renewables and notes that Innova has indicated that, subject to agreement of the legal arrangements, it expects to be able to withdraw its objection to the Project. This position is reflected in the signed SoCG submitted during Examination.

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		summarised in our previous representations. Further work is also required with regard to land rights, on which there has been limited discussion with NG to date and they have not set out what rights they require over the Parkgate site. Through ongoing discussion and agreement Innova expects NG to confirm that is has no issue with the installation of solar panels beneath the proposed overhead lines; that there is sufficient minimal height clearance between the solar panels and overhead line based on NG's design; and that NG will confirm that Tower TB94 (and its associated compound area) will be located completely out of the solar array area. Provided Heads of Terms are agreed, and the subsequent legal agreement put in place, Innova expects that it will be able to withdraw its objections to the Norwich to Tilbury project. There is no confirmed timeline, at present, for this process to be concluded. Innova will continue to engage with NG on this and update the ExA in due course. But recent overall progress is encouraging. Hall Farm Innova notes that NG does not consider that Innova's subsidiary (Hall Farm Solar BESS Limited) should be treated as a statutory undertaker for the purposes of s.127 of the Planning Act. NG says it is in discussion with Innova on this point although Innova has received no correspondence from NG on it to date. Innova considers that NG is taking a very narrow position on this issue given our client has a s.6 Electricity Act 1989 generation licence, a planning permission for its development and an option to exercise a lease (which can be exercised at any point and Innova expects that it will be in place before NG gets and exercises its powers under a DCO). There is no merit in disputing that Innova's Hall Farm Solar BESS Limit is a statutory undertaker for the purpose of this process DCO. In this regard, NG [see REP5-194] notes that the proposal will not cause serious detriment to Hall Farm's undertaking. NG gives no reason for this. Innova disputes this, particularly given NG is seeking unnecessary and unjustified powers of compulsory acquisition over the Eastern swathe of land (see previous representations from Innova explaining the reasons for this). If NG seeks to install apparatus over the BESS site, it could render the site undevelopable and there is no alternative land for it to be developed. It would also put Innova in breach of the planning permission for its development creating incompatibility between the two developments. This is a serious impediment to the exercise of Innova's undertaking and this is nothing other than serious detriment. Whilst	**Innova Hall Farm** The Applicant notes Innova's representation but does not agree that the powers sought over the relevant land are unnecessary, unjustified or would result in serious detriment to the undertaking. The interface between the Norwich to Tilbury Project and the Hall Farm Energy Storage Project is being actively considered through ongoing engagement between the parties and the development of the Statement of Common Ground. The Applicant notes that a number of interface matters have already been progressed through discussions between the parties, including arrangements relating to the haul road, construction interfaces and Innova's future cable crossing requirements. The SoCG also records ongoing discussions regarding the Hall Farm development site, construction compound, attenuation basin and other areas where the projects interact. The Applicant remains committed to working constructively with Innova to identify and implement appropriate design and land rights solutions. Discussions are continuing regarding the extent of rights required, the management of project interfaces and the legal mechanisms necessary to secure agreed arrangements between the parties. The Applicant welcomes Innova's confirmation that it intends to respond to the Heads of Terms recently issued and looks forward to continuing these discussions. Accordingly, the Applicant considers that the matters raised by Innova are capable of resolution through ongoing engagement, detailed design and legal agreement between the parties, and do not alter the Applicant's position regarding the necessity of the powers sought within the Order.

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		Innova does not wish to go over old ground again, briefly, Innova again notes that it disputes NG's position, ventilated in REP5-194, that Innova redesigned its proposal to be in conflict with NG's proposal. NG was consulted on the planning application. There was no agreement with NG nor a breach of any arrangement. NG was aware of the planning application and commented on it. It could have maintained involvement in the process and raised comments at any point during the planning application stage prior to determination. It chose not to. In any event, NG knew about the Hall Farm BESS planning application and knew that the approved BESS element was to be sited on the Eastern area of land well ahead of it submitting the application for the DCO. In spite of this, NG included rights of compulsory acquisition over the Eastern swathe of land (for which there is no justification) and it is interacting with consented elements of the western portion of land (including the attenuation pond, haul road, permanent access and 33kv cable). Innova has explained to the ExA and will reiterate again that it is content to engage with NG on the project interfaces and has proactively proposed solutions to NG. Innova encourages NG to set out what land rights it needs to deliver these solutions. However, the terms of this arrangement need to be secured through a legal agreement and Innova would like them to be agreed as soon as possible. Heads of Terms were issued to Innova on 23 June 2026 and Innova expects to reply to NG with comments on these very shortly.	
REP6-150	Great Horkesley Parish Council	Great Horkesley Parish Council continues to be concerned about the impact on the Dedham Vale National Landscape (part of which falls within our Parish) of the proposed infrastructure, and in particular the proposed sealing end compounds within and next to Great Horkesley. 2. The countryside within and surrounding our Parish is of real worth. This includes the Dedham Vale National Landscape and the Colne Valley (we endorse the view of the two independent landscape assessments in respect of the latter). 1. Both proposed sealing end compounds and associated infrastructure within the Parish and adjacent to it are sited too close to the National Landsca**pe and other special** areas including the Colne Valley, and are within their setting, and will have an adverse impact upon them. The visibility will be widespread and intrusive and cause permanent harm. Both the Dedham Vale National Landscape, and the Colne Valey and surroundings are special in value and deserve protecting. The local area is characterised by a tranquil setting and big skies. 2.	The Applicant has responded to similar matters above as raised in REP6-172 by villages Against Pylons and REP6-175 Aldham Parish Council.

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		The impact on special and protected landscape should not be overridden by costs considerations, as National Grid appear to do.	
REP6-203	Graeme Crook	At ISH 4 [when discussing Residential Visual Amenity Assessment], it was stated by the Applicant that the distance measured should be from the curtilage and not the property centre, as evidenced from the transcription: ([EV17-002] from 00:33:01:16 onwards) I have subsequently referenced the Works Plans (Section F) and the RVAA document, which also states that: *LI TGN 2/19 defines Residential Visual Amenity as 'the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage' (LI TGN 2/19, Page 3, Para. 1.2)1 .* It is my opinion that the distances quoted in the RVAA document are to the property centre, and not the property curtilage. Several examples of this including my own property are as follows [image included in response]: [*Redacted*] is listed in the RVAA document as being 152m from pylon TB169, and Halfway House 168m from TB171. However, using the property curtilage, I believe this to be ~120m for [*Redacted*] and 115m for Halfway House. If the route were to move by the allowed 50m, this has a significant impact to these properties. As a consequence, I am of the opinion that the RVAA assessment for these properties is not valid, it changes the magnitude of effect, something which I already disagreed with as being dismissive and with far too much use of the word 'likely' in the write up. There should be definitive wording when so much is at stake for homeowners.	The Applicant provided comments on this in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** in item 5.4j. In light of the question raised by Interested Parties 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 [REP5-126]** (the RVAA), the Applicant has provided an update and an addendum to the RVAA at Deadline 7 in **Document 6.13.A4 Environmental Statement Appendix 13.4.1 – Addendum to the Residential Visual Amenity Assessment**. 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.
REP6-203	Graeme Crook	Vibrations/Dust/Noise - I continue to be told that I am outside the zone of effect, yet I know for certain that this is not correct, based on the prevailing wind direction. I would welcome NG to discuss this and explain how they can be so certain that this would not be an issue.	<u>Noise</u> The property in question is in the construction noise study area. However, significant adverse effects are not expected. <u>Air Quality</u> The construction dust assessment is in **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [Revision B].** The assessment followed industry best practice guidance set out in the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction. Without mitigation there would be a negligible impact and no significant effect from dust for receptors beyond 250m of the Order Limits. The assessment concludes that with the appropriate implementation of dust mitigation which is set out in **7.2 Outline Code of Construction Practice [Revision G]** and

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			7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D] there would be no significant effect from dust on sensitive receptors within 250m as well.
REP6-203	Graeme Crook	EMF - National Grid direct to one of their many documents, but the words do not mean anything or give the reassurance needed for my family. The route does not have to pass as close to the property as it is proposed to do, there is scope to move much further away, or of course an HVDC underground alternative where there is much reduced risk. To date, despite NG continuing to say how proactive they are, I have not been contacted about my concerns.	The UK has a carefully thought-out set of policies for protecting against Electric and Magnetic Fields (EMFs), the main component of which is exposure guidelines as detailed in NPS EN-5. The exposure guidelines are set by independent scientific bodies and are based on decades-long studies into the effects of EMFs and ill health. After those decades of research, the weight of evidence is against there being any health risks of EMFs below the guideline limits. The Applicant has ensured that the Project comply with those policies, which are set by Government on the advice of their independent advisors. The Project has been designed to ensure it is fully compliant with these policies and guidelines as detailed in **7.8 Electric and Magnetic Field Compliance Report [REP3-034]**. This ensures that health concerns are properly and adequately addressed. EMF specialists were available throughout the consultation stage of the project to address specific concerns. The Applicant has also made EMF information available via www.emfs.info, which provides a public helpline again to answer questions on EMF related issues. If there are further questions or concerns which remain, the Applicant is happy to answer these directly via the Norwich to Tilbury Freephone number, address or email throughout the development of the Project: • Call our Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email us: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required)
REP6-203	Graeme Crook	Flooding - the generalised information makes no effort to address my concerns about localised flooding. Our property is at risk of flooding during excess rainfall, which will be significantly increased with the thousands of tonnes of concrete and haul road just uphill from the house. To date, despite NG continuing to say how proactive they are, I have not been contacted about my concerns.	All rainfall that falls onto areas of impermeable land cover created by the Project during its construction and operation will be captured at source, collected and conveyed to a range of drainage features that will store the water and attenuate it, until it is either soaked back into the ground where conditions are suitable, or released to nearby watercourses at rates no greater than pre-development rates. The drainage proposals presented within **8.2 Drainage Strategy DCO (Clean) (Final Issue D),** updated for submission at Deadline 7, have been developed to accord with National and local drainage standards. A further level of detail will be developed by the Main Works Contractor(s), in accordance with commitment GG22 within the **7.2 Outline Code of Construction Practice**, for review and approval by the relevant flood risk management authorities to discharge Requirement 4 of the DCO.
REP6-203	Graeme Crook	Traffic - it is my opinion that whilst traffic surveys have been carried out, they do not actually take into consideration what this will mean in terms of effect for local communities. Nor have National Grid been able to answer when and how long roads would be closed for, significant impacts that must be documented. For example, the Roxwell Road A1060 is at 100% capacity during peak times, how will hundreds of lorries use this route? To date, despite NG continuing to say how proactive they are, I have not been contacted about my concerns.	**7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [Revision B]**, details that the Applicant is increasing the number of HGVs using the A1060 Roxwell Road (Link PAR 51) in the AM and PM peak hour by 3% (net increase of 27 HGVs in each peak hour). The peak duration of traffic is expected to occur for approximately 1 week during construction. The junction operation of A1060 Roxwell Road and Lordship Road (Site 69) was assessed within **7.11 Transport Assessment [Revision B]**, where it was concluded that the introduction of the Project traffic has a negligible impact upon the operation of the junction. The junction is predicted to operate over capacity in all AM and PM future year scenarios. The mitigation proposed in Table 5.10 of **7.3 Outline Construction Traffic Management Plan [Revision F]** is to monitor the operation of the junction during construction.
REP6-203	Graeme Crook	Mental Health - National Grid say 'The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings.' To date, I have never been proactively contacted by National Grid to discuss any of my concerns, presumably as they see me as unaffected, despite being surrounded by the draft order limits and	The Applicants land agent, Fisher German telephoned the AP in March 2026 and subsequently followed up by email providing information regarding magnetic fields as requested. The Applicant notes that engagement is undertaken proportionately with those whose land or interests are directly affected by the Proposed Development and that opportunities have been provided throughout the consultation and Examination processes for all interested parties to raise concerns and seek further information. The Applicant therefore does not agree that it has failed to engage regarding the AP's concerns and considers that it has fulfilled its statutory consultation obligations and has provided appropriate opportunities for the AP to engage with the Project and obtain information on matters raised.

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		just over 100m from the nearest proposed pylon. To date, despite NG continuing to say how proactive they are, I have not been contacted about my concerns.	
REP6-214	Kathleen Lee	Submission ID: S4E99E4BF I write on behalf of Katherine Lee ("the Landowner") [*Applicant note: it is understood this is an error and should refer to Kathleen Lee]* to provide a further update regarding the Landowner's continuing objection to the proposed third-party works, following the submission made at Deadline 4. Engagement with UK Power Networks ("UKPN") The draft Development Consent Order ("DCO") promoted by the Applicant includes powers relating to works to be undertaken by UKPN. However, there remains a significant lack of clarity regarding the precise nature, extent, location and justification of the proposed UKPN works affecting the Landowner's interests. Whilst reference has been made to the rerouting of existing infrastructure to facilitate the Norwich to Tilbury Project, no detailed information has been provided in relation to the specific works proposed on, or affecting, the Landowner's land. The Landowner received no communication from UKPN, nor from its appointed agent Dalcour Maclaren, until an introductory Microsoft Teams meeting held on 23 April 2026. That meeting was attended by Jack Cook and Dexter Myres of Dalcour Maclaren on behalf of UKPN, and Jane Kenny and David Jones of Savills on behalf of the Landowner. The meeting was introductory in nature and did not provide the detailed information required for the Landowner to properly understand the implications of the proposed works. During that meeting, it was confirmed that Fisher German had been engaging with UKPN regarding the retention of the third-party works within the neighbouring field that is already significantly affected by the Project and lies within the Order Limits (see attached plan). Dalcour Maclaren subsequently requested copies of any written correspondence relating to those discussions, it was confirmed that no such correspondence had been issued or received. Dalcour Maclaren was directed to Nick Robinson of Fisher German, acting on behalf of the Applicant, who had been leading discussions with UKPN on this matter. Since that meeting, there has been no further meaningful engagement from UKPN or Dalcour Maclaren beyond the verbal discussions referred to above. Efforts are currently being made to arrange a site meeting involving representatives from UKPN, Dalcour Maclaren, Savills and the Landowner. Notwithstanding the proposed site meeting, the current position remains	The UKPN works are required to divert underground the existing wood poles and overhead line across the APs land to ensure safety electrical clearances are maintained. The Applicant notes the Landowner's concerns regarding engagement with UKPN. The Applicant understands that a meeting was held between UKPN's appointed representatives and the Landowner's representatives on 23 April 2026 and that arrangements are being progressed for a further site meeting to further discuss the proposed works in more detail. The Applicant and UKPN will continue to engage with the Landowner and their representatives regarding the design, location and implementation of the proposed third-party works. The Applicant does not agree that engagement has been wholly insufficient or that the proposed powers are unjustified. The inclusion of rights and powers relating to UKPN apparatus reflects the need to facilitate the relocation, diversion, protection or modification of existing electricity infrastructure affected by the Project. Engagement with statutory undertakers and affected landowners is ongoing and continues to evolve as designs are refined and technical requirements are confirmed. The Applicant acknowledges that detailed discussions regarding the precise extent of the UKPN works and any associated land requirements remain ongoing. The Applicant and UKPN will continue to work with the Landowner to understand site-specific constraints and to identify reasonably practicable measures to minimise impacts on the farming business whilst ensuring that the works required to facilitate the Project can be delivered. Any acquisition of land or rights, and any losses arising from the exercise of DCO powers, would be compensated in accordance with the Compensation Code.

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		wholly unsatisfactory. UKPN continues to seek extensive rights over private land without having adequately engaged with the Landowner, provided sufficient information to demonstrate the necessity of its proposals, or properly assessed and explained the impacts on the farming operation. To date, the Landowner has received no substantive response, meaningful update, or satisfactory explanation from either the Applicant or UKPN regarding the fundamental issues affecting the farm and its ongoing operation. Conclusion Nearly a year after the submission of the Application, significant concerns remain unresolved. Engagement with the Landowner has been limited and wholly insufficient to enable a proper assessment of the impacts that the proposed development would have on the farming business. This lack of engagement is particularly concerning given: • The significant and long-term impact the proposals would have on the farming business; • The scale of the proposed infrastructure crossing productive agricultural land; • The extensive compulsory acquisition and rights powers being sought over privately owned land; and • The requirement on applicants to demonstrate a compelling case in the public interest before powers of compulsory acquisition can be justified. The Applicant submitted its application for a Development Consent Order on 29 August 2025, including powers for the compulsory acquisition of land and the acquisition of rights over substantial areas of the Landowner's holding. Despite the passage of considerable time, neither the Applicant nor UKPN has provided sufficient information or justification to support the extent of the powers sought. In the absence of such information, and given the continuing failure to engage meaningfully with the Landowner on matters directly affecting the operation and viability of the farming business, the Landowner maintains that the proposals are unjustified, inadequately evidenced, unnecessary and disproportionate. Written on behalf of the Landowner by Jane Kenny MRICS FAAV FALA	
REP6-215	Mark Ian Weeks Passmore	I noted that the KC representing National Grid (NG) was intent on using convoluted language in order to support fully the proposals for construction of the pylons from Norwich to Tilbury. He seemed simply to wish to justify NG's plans regardless of the regulations and regardless of the negative impact on local communities. Much of his commentary was simply not true.	The impact of the Project on the three assets identified in the IP's comment Coney Byes (1225071), Highfields Farmhouse (1225094), and King's Farmhouse (1266530) has been fully assessed and details on and the results of the assessment is reported in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated**

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		I have a particular interest in the Colne Valley. I responded previously to questions raised by the Inspectorate in respect of two listed properties in the Colne Valley; Coney Byes Farmhouse the PM and Highfields Farmhouse CO6 3DP. The Inspectorate asked questions specifically about these two properties in paragraph HE 1.34 of their enquiries to NG following NG's submission of their planning application. National Grid responded by stating that there would be no significant impact upon the environment enjoyed by these properties as a result of constructing pylons. Nothing could be further from the truth. I wrote to the Inspectorate challenging NG's assertions at the time but have been unable to find any reference to either of these properties in subsequent documentation. The proposed route for the pylons would result in these structures being within 200 metres of the curtilage of both of these properties. Within the immediate vicinity there is also Grade II listed Kings Hall which would be dramatically affected by these proposals. Only Kings Hall has been noted in the Environmental Statement (Volume 6, Document 6.13.A4, Final Issue, June 2026) that has been prepared by NG. It refers to 364 residential buildings that have been identified within the 200m study area. Since the curtilages of both Coney Byes Farmhouse and Highfields Farmhouse are clearly within that limit, and both have been excluded from the Statement, this can only lead one to the conclusion that NG materially understates the impact of these pylons along the whole route. It should also be noted that in "Landscape Opportunities" NG propose to plant a single hedge in this part of the Colne Valley. This will have no benefit to the properties noted above; such a hedge could only be a small fraction of the height of the proposed pylons, even when mature in many years' time, and would make no difference to the overwhelming impact of the proposed pylons in the valley and is entirely unsympathetic to fact that the valley will have been despoiled. I am also aware that NG have started significant works in the countryside in anticipation of this project being granted approval. They have also applied for permission to undertake further major preparatory works in anticipation of the permission being granted. This seems to me to be entirely inappropriate and should not be permitted. The Inspectorate are aware of the significant disruption that this proposed project is having and will have to people's lives including their mental wellbeing. It is to be	**Heritage Assets [Revision B]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The settings of Coney Byes (1225071), Highfields Farm (1225094), King's Farmhouse (1266530) has also been considered in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]** (pp. 583-583, 699-700), **8.4.12 Applicants Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** (pp. 44-45), and **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** (pp. 181-184). The Applicant is confident that the results of the assessment are proportionate and appropriate within the DCO framework. The Applicant would respectfully state that the IP is incorrect that Coney Byes and Highfields Farmhouse are not considered in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. King's Farmhouse is named in paragraphs 11.7.40 and 11.7.124 as the construction and operation (and maintenance) phases of the Project will result in a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in its setting that affect its value. Coney Byes and Highfields Farmhouse are included in the count of Grade II listed buildings referenced in paragraphs 11.7.41 and 11.7.125 as the construction and operation (and maintenance) phases of the Project will result in a low adverse magnitude of impact resulting in a temporary minor adverse residual significance of effect, which is not significant, due to changes in their settings that affect their values. Regarding the Landscape Opportunities as referenced, please refer to the Applicant's comments on responses to ISH2 Action Point 27 in **8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]** which consider similar points made directly in response to the drawings produced for Action Point 27. In respect of planning applications for preparatory works, the Applicant is considering an option to submit a separate planning application to local planning authorities for some small, localised enabling works, to support the phasing of construction. This is a normal approach for many major infrastructure projects. As part of these applications, plans will be included to reinstate any work we carry out if the DCO is not granted. The Applicant previously consulted on these works while we developed our proposals for the Norwich to Tilbury project. No new or additional works are proposed beyond those set out in the DCO application. The Applicant expects to submit our applications in late July. Once submitted, the local planning authorities will undertake consultations on the Applicant's plans. The residential visual amenity of Highfields Farmhouse has been considered by the Applicant in an addendum to **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Final Issue C [REP5-126]** (the RVAA) submitted at Deadline 7. This **Document 6.13.A4 Environmental Statement Appendix 13.4 –Residential Visual Amenity Assessment [Revison D]**recognises that a part of the curtilage of Highfields Farmhouse lies within 200 m of the permanent above ground elements of the Project. However, as this area is located 200 m beyond the nearest proposed pylon the effects on it are not considered likely to affect 'living conditions' – as defined in the RVAA, and the industry guidance this follows. The curtilage and dwelling of Coney Byes Farmhouse lie outside of the 200m offset from the Project Centre Line, as shown on the Works Plans. Therefore, it has not been included in the Residential Visual Amenity Assessment - see **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment**. The Applicant maintains that the findings of the Step 2, 3 and 4 assessments

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		hoped that NG will be required to change their plans to a project that is more reasonable and acceptable	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.
REP6-218	Nick Cheeseman	Reference your letter EN020027 dated 5 June 2026 and the Applicants reply at Document: 8.26 Response to Rule 17 Letter received 5th June 2026. I…would like to draw the ExA attention to the following: 3.2 The Applicant's Response 3.2.1 An explanation is set out in the paragraphs that follow why these properties were not included in the RVAA at submission, however an assessment of the likely change to their visual amenity as a result of the Project is provided at the specific request of the ExA. Justification for not including the three Properties *(and not all five as asked by the ExA in the above question)*, in the Submitted Residential Visual Amenity Assessment (RVAA). 3.2.2 Section 2 of the RVAA [REP4-148] sets out the methodology for the inclusion of properties within the assessment. Paragraph 13.2.4 of the RVAA [REP4-148] states that those residential properties whose curtilages fall within 200 m of the centre line of the permanent above ground elements of the Project – the 'Study Area', form part of the assessment. Paragraph 13.2.4 clarifies that this distance 'was informed by experience, observations made on site during field surveys and an understanding of the Project'. Note: No field studies have been undertaken by the Applicant of the area under consideration, see 3.2.9 that states that the visualisations are not verified views (as data from their locations has not been collected in person). It also draws upon the Landscape Institute's 'Technical Guidance Note2/19: Residential Visual Amenity Assessment' (LI TGN 2/19)1. Paragraph 4.7 of LITGN 2/19 states that 'when assessing effects of overhead transmissions lines, generally, only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA'. The RVAA [REP4-148] extends its Study Area up to 200 m in order to allow for the Project's lateral Limits of Deviation (LoD). Whilst I would accept that some of my disagreements with this answer are subjective, there are significant errors in what they have produced, both in terms of the RVAA and the pictorial submissions. The applicant has not answered the question and failed to mention the properties No 72 and 73 Flordon Road, NR15 1RT in	The Examining Authority's Rule 17 letter [PD-027] requested an assessment of three properties: 70, 71 and High Hopes, Flordon Road. The applicant already assesses the remaining two properties mentioned in the letter (i.e. 72 and 73 Flordon Hall Cottages) in Tables A13.4.3 and A13.4.5 of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**. The 'field studies' the Interested Party's submission refers to were undertaken from publicly accessible locations (as stated in Paragraph 13.2.13 of document **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**) such as public highways and public rights of way. This includes public footpath 'Flordon FP2' that runs directly between High Hopes and no 71 Flordon Road. The applicant set out its Residential Visual Amenity Assessment of 72 and 73 Flordon Hall Cottages in Tables A13.4.3 and A13.4.5 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**. This was prepared with awareness of the proposals for tree and hedge removal set out upon sheets 3 and 4 of document **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A (Tracked) Version of Deadline 4 Submission [REP5-048]**. This shows retention of majority of the trees and hedgerows within the curtilage of No 72 Flordon Rd. The measurements contained within Section 3 and Appendix A of document **8.26 Response to Rule 17 Letter received 5th June 2026 [REP5A-003]** are prepared using computer modelling of the Project's route, as stated in paragraph 13.3.3 of **Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]**, and Ordnance Survey mapping. 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 the notes upon each of the visualisations, state that the prepared images are indicative only. Paragraph 1.1.5 also sets out the limitations of the visualisations in respect of the datasets used to record the location, form and height of trees and hedgerows. Table 3.1 (at page 14) of document **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 (Final Issue A) [REP-298]** recognises the presence of the fencing surrounding High Hopes, as referred to in the Interested Party's submission. It also recognises the 'maturing trees and shrubs' within the garden area. Table 3.2 of document **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 (Final Issue A) [REP-298]** sets out the cumulative residential visual amenity impact upon High Hopes arising from the Project in combination with cumulative development SN44 (installation of a battery energy storage system (BESS), approximately 500m to the north-west of High Hopes). It is the existing tall mature hedgerow to the immediate west of Flordon Road past High Hopes (which, it reasonably assumed, is not likely to be cut down to enable the BESS developer to deliver construction materials from the direction of the B1113) and the proposed planting around cumulative development SN44 (as listed in Table 3.2) that would prevent significant cumulative effects from occurring.

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		the response. Both these houses are within 120 and 130 meters of pylon RG 21 respectively and so would become subject to the RVAA as determined by the Applicants own admission in paragraph 4.7 of LI TGN 2/19 which states that 'when assessing effects of overhead transmissions lines, generally, only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA'. The RVAT is defined in paragraph 2.1 of LI TGN 2/19 as the point 'at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance'. To compound the problem, it has only recently come to light that trees and hedges in the curtilage of No 72 Flordon Rd will be removed to facilitate the undergrounding of electrical cables that are currently in place. The kitchen window and a bedroom window of property no 72 Flordon Road look directly towards pylon RG 21 and the removal of the vegetation will have a dramatic effect. Paragraph 13.2.26 of the RVAA [REP4-148] states that the RVAT is judged by considering whether the Project, for example blocks the only available view from a property, is overwhelming in views in all directions from the property, is unpleasantly encroaching and / or is inescapably dominant from the property. No 72 Flordon Road in particular will have pylons RG 21 and RG 22 clearly and inescapably dominating all views from the property. In respect of houses at 70 and 71 Flordon Road and the House, High Hopes, both the measurement distances recorded and the Viewpoint pictures are wide of the mark. Furthermore, if the maps presented are accurate and RG 22 is at the point marked, then the measurements they claim to the curtilage are inaccurate. When measured accurately on the ground they are wrong by at least 15 meters, this begs the question, how many other measurements are inaccurate? The viewpoint pictures are interesting. 3.2.9 states that the visualisations are not verified views (as data from their locations has not been collected in person). For once it seems that I must agree with the Applicant; this must be one of the most accurate statements they have made. It is very evident that the illustrations bear no similarity to reality and that whomever produced them, had never set foot on that area of the farm. We are not sure whose fields the visualisations are depicting but they have no	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. The Applicant notes the respondent's feedback regarding the alternative route suggested in this area. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes made and or explaining why they have not been made. Further information concerning specific routeing and siting considerations in this location, including the change originally requested may be found in the following documents within the Examination Library: • **5.1 Consultation Report [Revision B]** Ref no. 9-3.148 in Table 9-3 • **5.15 Design Development Report [Revision B]** paragraph 4.2.4 (page 39) and Figure 4.2 on page 40 • **7.21 2024 - Design Development Report for the Project [APP-359]** paragraphs 5.4.17 to 5.4.19 (page 40) and Figure 5.2 on page 41 The Applicant disagrees that the Holford Rules have not been considered or are breached. **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (**7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359**]) and with the application for development consent (**5.15 Design Development Report [Revision B]**), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.

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		resemblance to ours, even taking into account that they purport to show the hedges and trees in winter. To clarify and to eliminate any doubt, High Hopes has a plain 5-foot-high wooden panel fence surrounding the property on all sides. It has two vehicle gateways, (in and out), on the west side leading onto Flordon Road. There are no trees, hedges of vegetation that would obscure the view of Pylon RG 22 from the property. You can currently see 9 existing pylons for High Hopes Garden and in excess of 15 from the east and south facing bedroom windows. There will also be a clear view of pylon RG 23 from the south and west facing bedroom windows. The Applicant also states the following in respect of cumulative development within the area: Table 3.2 Assessment of likely change to visual amenity – High Hopes (A28) Cumulative development SN44 (installation of a BESS including associated infrastructure and landscaping) would be located approximately 500m to the north-west of this property. Views to this would be severely prevented by the: existing tall mature hedgerow to the west of Flordon Road past High Hopes; the tree groups along Wymondham Road; and the proposed planting around the cumulative development. Consequently, no significant cumulative effects are anticipated. Unfortunately, we have been notified that due to the required road realignment/6-225widening and the proposed Bell Mouth structures, most of the trees and all of hedges (1.3km) are going to be cut down along the Wymondham Road and part of Flordon Road. This is to enable the Applicant to bring in the steels etc from the direction of the B1113. Therefore, to state that there will be no significant cumulative effects is at best disingenuous. In the Applicants summary they state at 3.4.3 The assessment identified that only one of the three properties – 'High Hopes', would be expected to experience a high magnitude of change to its visual amenity. Even when considering the worst-case scenario of the Project maximising its use of the Limits of Deviation. Nos. '70' and '71', Flordon Road were found to experience a low medium magnitude of effect. This summary misses the effect on the properties at No 72 and 73 Flordon Road which cannot fail to experience a high magnitude of change to their visual amenity. Not	

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		only will the pylon RG 21 be within 120m but the high voltage power cables span will be even closer. Frustratingly in respect of the Cottage and High Hopes, if the route had been altered as originally suggested, about 400m north west, then none of this would have been a problem. I was informed that the route could not change primarily because of the Holford Rules, in particular, rule 3. This rule states the following: Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers. Well clearly, not all routes were equal. One way there were no houses and minimal impact on the farm and the other way is the one they are fostering upon us, with a huge impact on people's lives and devastating to the farm. It appears that in respect of the Holford Rules the applicant is failing them in most if not all respects. So, in sum, the Applicant has failed to answer the exam question accurately and honestly. The answer clearly contradicts itself and shows that their assessment process is flawed. This is only one small part of the route; if this is inaccurate and deliberately misleading and clearly a breach of the Holford Rules, how can any part of their route planning be considered for onward progression? I am at a loss as to how we are meant to respond to this sort of inaccurate and misleading information. We are trying our best to come to terms with the intended structures but the applicant's misrepresentation of the facts makes it extremely difficult to respond with certainty and clarity.	
REP6-213	Karl Owen	1. The Wirescape — What This Proposal Does to a Family's World [redacted text] sits alone on flat, open mid-Suffolk farmland with unobstructed sightlines for miles in every direction. Standing at the cottage today, a person looking around the full 360 degrees of visible landscape will see, to the east, the existing 1950s 400kV pylon line. That existing line occupies approximately 30 degrees of the total visible landscape. The remaining 330 degrees is open Suffolk countryside — fields, hedgerows, woodland, and sky. When the Norwich to Tilbury transmission corridor is built, that picture changes entirely. The new route runs on a broadly north-south alignment to the west of the cottage, with the nearest pylon approximately 100 metres away to the north-west — a structure standing approximately 50 metres tall, at least ten times the height of the cottage itself. The route approaches from	The Applicant has reviewed further submissions from the Affected Party, including information the Affected Party has provided concerning certain personal circumstances relating to a member of the household. Firstly, it is important to emphasise that the Applicant does not underestimate the seriousness of what has been described by the Affected Party, and has discussed the situation with the individual during a meeting prior to the commencement of CAH3 on June 24 2026 at the hearing venue. Furthermore, the Applicant acknowledges and understands its obligations with respect to ensuring that those with protected characteristics as defined by the Equality Act 2010 are treated appropriately and their needs understood, so that proportionate and effective support can be offered. The Applicant recognises the personal circumstances described in the Representation, and their desire to ensure that the Project's impacts on their property are mitigated as far as reasonably possible. The Applicant has reviewed previous correspondence and details of meetings, including discussions that have taken place during meetings with the Interested Person at their property (24 May 2024) and throughout the course of the development of the Project, and is committed to further continued engagement with the Affected Party.. The request that the Applicant funds the provision of a purpose built annex to the main property was tabled by the Affected Party during the meeting on 24 June 2026, accompanied by detailed costings.

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		the north, passes at its closest on the west side, and winds south past The Thickett woodland before continuing on the plateau beyond. To every point of the compass except the south-eastern line, pylons will dominate the view. The result is this: the 330 degrees of open countryside that currently surrounds this family's home will become 330 degrees of wirescape. The only remaining view that will not contain pylons is 30 degrees to the south-east — A narrow gap between the old pylons and the new pylons. That 30 degrees matters enormously. It is not a planning abstraction. It is the view from the art studio window of a proposed annexe for a [redacted] with protected characteristics, deliberately oriented to face the one remaining direction from which this family's land will not be permanently dominated by the consequences of a decision they did not make and cannot reverse. 2. The Person This Annexe Is For The annexe at [redacted text] is proposed for the family's [redacted text] who has lived at the cottage her entire life and who holds a lifelong interest in the property under the terms of a peppercorn tenancy that will pass to her on her parents' deaths. is not merely her current home. It is her permanent home, for the rest of her life. She has been formally assessed by medical and psychiatric professionals and carries documented diagnoses including [redacted text] and associated conditions involving [redacted text]. She is registered with the relevant authorities and holds letters, reports, and assessments from qualified doctors, consultants, and psychiatrists confirming her conditions. Her conditions constitute [redacted text] under the Equality Act 2010. Her documented history includes [redacted text]. These are not matters of ordinary anxiety about development. They are objective, evidenced, clinical facts documented across years of medical and psychiatric records. She is also [redacted text]. Her living environment — its noise, its visual character, its sense of safety and containment — directly affects her mental health and stability. The [redacted text] that followed the family's first knowledge of the Norwich to Tilbury proposal, and the [redacted text] was directly and causally connected to the threat to her permanent home and her sense of safety within it. When the construction begins this peaceful rural haven will become a building site of national significance in scale with prolonged	The Applicant is currently reviewing the Affected Party's information and submission. The Applicant proposes to respond formally to the specific proposals tabled by the Affected Party at Deadline 8. In response to the specific questions that the Affected Party has raised in point 6 of this submission: • The Applicant amended aspects of the Project in response to targeted engagement at this property, including the meeting in the presence of the Counsellor which took place on May 24 2024. These amendments included the realignment of the overhead lines and construction route so that they are both further away from the Affected Party's cottage and the proposed annex referred to in the Representation. • An Equality Impact Assessment for the project [**APP-352 and REP1-067**] form part of the Environmental Statement. Having reviewed the alignment of the Project which was amended following the on-site meeting in May 2024 , the Applicant has reviewed the distance from the closest towers to the centre of the property under discussion (the dwelling itself) and confirms that the two closest towers are no closer than they were previously to the cottage and are now further away from the proposed Annex which the Affected Party describes. The Applicant therefore disputes the Affected Party's statement that the nearest tower is now closer following the realignment. • The Applicant developed the proposed realignment to the west of the Affected Party's property following discussions with the Affected Party on site in May 2024 to accommodate the Affected Party's concerns over impacts on views from the property and operational noise from the lines. The Noise and Vibration assessment prepared by the Applicant [see **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]**] scopes out the assessment of significant adverse impacts arising from the operational noise of the overhead lines in **6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [Revision B]**. The Applicant's position is that reasonable mitigation measures to minimise the impact on views from the cottage have been incorporated into the Project. With regard to noise from the overhead lines, the Applicant has provided evidence in the Environmental Statementto support its position that noise from the overhead lines will be insignificant. • The Applicant remains willing to engage constructively with the Affected Party, including the impact of the construction process on traffic and access to Lambert's Lane. Additionally, the specific requirements of communication strategies are being developed to keep residents and communities informed on construction activities near their property, and will help families or individuals with specific needs to plan in advance so they are able to manage their time during such periods. .

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		construction activity that will permanently and dramatically alter her surroundings and be particularly challenging for her. 3. What Has Changed — and Why the Annexe Is Needed Now The conversion of the existing barn on the eastern side of [redacted text] into an annexe for this young woman was a firm family plan, deferred only on grounds until the family was in a position to fund it. It was not a speculative idea. It was a considered, specific commitment to providing her with the supported independence she needs — her own front door, her own space, her dog, and a short path to her parents for help with medication, meals, and daily care. National Grid's proposal has fundamentally changed that position. The construction corridor on the western side of the property makes the annexe — situated to the east, with the main house sitting between it and the entire construction zone — not merely desirable but urgently necessary. The construction period, which will bring three years of continuous noise, vibration, dust, HGV movements, and the presence of large numbers of unfamiliar workers to the western side of the cottage, makes a quiet, sheltered, independent space on the eastern side of the property a specific and pressing welfare need for a person with her documented vulnerabilities. The family is not in a [redacted text] to build the annexe without assistance. That position has been directly worsened by the uncertainty, stress, and financial impact of this proposal over the years since it became known. We are asking National Grid to fund the construction of the annexe not because our original plans were made unviable, but because their proposal has created an urgent need that we cannot meet ourselves — and because providing this young woman with a quiet, sheltered, independent space away from the construction is the single most meaningful reasonable adjustment the Applicant could make for a person with protected characteristics whose permanent home is directly affected by this project. 4. The Witness Account — What [redacted text] Saw and Heard On the occasion of a personal visit to [redacted text] by National Grid Project Leader [redacted text] accompanied by a National Grid colleague, the family was also joined by Suffolk County Councillor [redacted text] who was present throughout and within earshot of the conversations that took place.	

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		The group first paused in the back garden of the cottage, where the resident informed [redacted text] explicitly of his [redacted text], of the [redacted text] and of the [redacted text] Councillor [redacted text] was present during this conversation. The group then walked together toward the existing outbuilding at the eastern part of the property — the building identified as the annexe site. The resident, [redacted text], his colleague, and Councillor [redacted text] paused at this location for a period of some minutes. The resident explained clearly to all present that this was the location where the haul road had been planned to run, directly adjacent to and butted up against the outbuilding, and that the family intended to demolish the outbuilding and replace it with a purpose-built supported living annexe for their daughter — her own independent space, her own front door, her dog, just steps from the main house and the daily parental support she requires. The group then continued along the public footpath toward the proposed alignment, approximately 30 metres further to the east. The site, the purpose, and the need were all made plain to [redacted text] in person, on the ground, in the presence of a serving county councillor. The subsequent Suffolk 3 realignment moved the haul road away from the eastern annexe site and repositioned it on the western side of the property along Lambert's Lane — but simultaneously moved the nearest pylon closer to the cottage, as confirmed in National Grid's own Suffolk 3 realignment report. The haul road has since been moved again, onto Lambert's Lane itself — the road the family uses a minimum of sixteen times daily. Each change has been documented. Each change has worsened some aspect of the family's position. None has addressed the fundamental question of what this proposal does to a vulnerable young woman in her permanent home. 5. The Annexe — A Description The proposed annexe is a Suffolk barn-style building of one and a half storeys, designed around the specific needs, vulnerabilities, and gifts of the young woman who will live in it. It has been conceived not as an institutional or clinical space but as a home — warm, open, light-filled, and oriented deliberately toward the one remaining view from this property that will not be dominated by pylons. The Building	

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		The ground floor comprises three connected spaces in an open-plan arrangement: a kitchen at one end where the resident is learning to cook and developing her independence, a large central living space where she and her siblings can spend time together away from the construction noise and visual intrusion on the western side of the property, and a games room and yoga space at the other end — yoga being an established part of her wellbeing routine. The central space rises to full ceiling height with large south-facing windows looking out over the 30 degrees of open countryside that will remain free of pylons in the direct view. This is the heart of the building — light, open, and connected to the landscape that has not been taken. The upper floor is accessed by a spiral staircase from the ground floor. A walkway at first floor level links the two upper spaces across the open central void, with a balcony overlooking the living space below — creating a sense of openness and connection between all parts of the building. At one end of the upper floor is the bedroom — contained behind a wall and door for privacy and quiet. At the other end is the art studio. The Art Studio The art studio is the most important room in the building. It faces south, with a window looking out over the 30 degrees of undominated landscape — the one view from this property that the Norwich to Tilbury proposal has not taken. It is specifically designed and oriented to give this young woman a place to create, in light and quiet, looking out over countryside that is still hers. Art is not a hobby for this young woman. It is a documented part of her recovery, her stability, and her identity. She is a talented and accomplished artist whose work has been exhibited in a gallery in Manningtree and shown at a gala event for artists with [redacted text] held in a church in Cambridge. She has sold her work. She attends a weekly art class in Ipswich specifically for [redacted text] attended with her mother. Her easel, her paints, her brushes, and her materials are central to her daily life. The art studio in the annexe gives all of that a permanent, proper home — and gives her a space to create that looks away from everything this project has done to the landscape around her permanent home. Connection to the Main House and Garden The annexe is connected to the main house and garden by a short path — a few steps from her parents' door to hers. A dormer opening at roof level leads onto a raised deck and external balcony, connected by steps back down into the garden, linking the upper floor directly to	

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		the outside. The building is on the eastern side of the property, with the main house sitting between it and the entire construction zone and pylon corridor to the west. It is the quietest, most sheltered part of the property — as far from the construction noise, HGV movements, and permanent crackle of 400kV lines as it is possible to be while remaining within the family's home. 6. The Questions This Raises for the Applicant We are seeking a mitigation proposal, not necessarily a formal legal entitlement, though the legal basis exists. We are asking the Applicant to engage constructively with the following questions: — Did the Applicant properly consider the [redacted text] of this resident after being explicitly notified of them by the resident in person, in the presence of a county councillor? — What equality impact assessment, if any, was carried out following that notification and before the decision to move the nearest pylon closer to the cottage was made? — Has the Applicant assessed the specific impact of the proposal on this resident, given her documented vulnerabilities, her environmental sensitivity, and the permanent nature of the infrastructure on her permanent home? — Has the Applicant explored reasonable mitigation measures specific to this resident's circumstances? — Has the Applicant engaged constructively with the family to find solutions that reduce harm? Here is the problem. Here is the evidence. Here is a practical solution. The annexe is a specific, costed, designed mitigation measure that directly addresses a foreseeable and documented impact on a [redacted text] It is not an ordinary planning request. It is a bespoke response to a bespoke harm — harm caused to a specific person in a specific place by a decision made without adequate regard to her existence, her vulnerability, and her rights. 7. The Medical Evidence The medical and psychiatric evidence available to support this case includes: — Formal diagnostic assessments confirming [redacted text] and associated conditions — Psychiatric reports documenting conditions involving [redacted text] and [redacted text] — Medical records documenting [redacted text] — Hospital records relating to [redacted text] — Documentation of	

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		— Care documentation confirming [redacted text] — Witness evidence from both parents of a direct [redacted text] following the family's first knowledge of this proposal, with the family's GP able to corroborate. — Witness evidence from the family regarding the impact of the proposal on this resident's daily life and stability This evidence is available and can be provided to the Examining Authority or to the Applicant in a confidential context. It documents not ordinary anxiety about development but a [redacted text] whose interaction with this proposal creates a specific and evidenced welfare harm that the Applicant is required by law to address. 8. A Final Reflection The farm estate's landowners have noted that [redacted text] We ask the Examining Authority and the Applicant to consider a wider question alongside that one: what of the value of the lives of the people who live in it? Does a proposal that permanently dominates the home of a vulnerable young woman, removes the landscape that surrounds it, generates noise she cannot escape, and prevents the independent living space she needs — does that proposal not also reduce the value of her life? We are not asking for the project to be stopped. We are asking for one young woman's [redacted text] to be made liveable for her — with a quiet room of her own, an art studio looking south over the last undominated view, and a short path back to her family. That is the annexe. That is what we are asking National Grid to fund.	
REP6-191 REP6-236	Cullum Agri Ltd T A Cullum Contracting Ltd *Applicant note: these submissions are identical and therefore merged to avoid duplication of the Applicant response, however it is noted that they are separate landholding entities*.	I write on behalf of Cullum Agri Ltd [T A Cullum Contracting Ltd] ("the Landowner") to provide a further update regarding the Landowner's continuing objection to the proposed overhead electricity transmission infrastructure crossing a significant area of the holding. Update position Following the submission made at Deadline 4, a further meeting was held on 19 June 2026 between the Applicant, Fisher German (acting on behalf of the Applicant) and Norfolk land agents representing landowners, to continue negotiations regarding the proposed Heads of Terms. Whilst some positive progress has been made, there remain a number of fundamental issues that have yet to be resolved before generic Heads of Terms can be agreed. Thereafter, detailed site specific provisions will still need to be negotiated and agreed. The Landowner's principal outstanding concerns remain: The extent of the permanent and temporary land take required for the proposed development; The siting of pylons and	The Applicant notes the AP's concerns, however it does not agree that these matters have not been addressed. The extent of land required, the proposed pylon locations and the engineering rationale for the Proposed Development have been explained through the application documents, ongoing engagement and discussions with the AP's representatives. The Applicant has also sought to identify and consider site-specific accommodation measures through the land rights negotiation process and will continue to do so to mitigate the impact on the agricultural business as detailed design progresses. The Applicant notes that detailed construction methodologies, drainage solutions, soil management measures and reinstatement proposals are matters that are developed through the detailed design phase. This is consistent with the staged approach secured through the DCO and associated management plans. The Applicant acknowledges the AP's concerns regarding the impact of the Proposed Development on the farming business. Any person whose land or interests are affected by the exercise of compulsory acquisition powers would be entitled to compensation in accordance with the Compensation Code. The Applicant does not agree that the powers sought are unjustified. The case for compulsory acquisition is set out in the Statement of Reasons and the Applicant considers that the land rights sought are necessary, proportionate and no more than are reasonably required to deliver the Proposed Development.

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		supporting infrastructure, particularly the need for structures to be positioned within field boundaries and other locations that minimise disruption to agricultural operations; The continuing impact of the proposals on the efficient operation, viability and future management of the farming business. To date, the Landowner has not received any substantive response or satisfactory update from the Applicant on these fundamental matters. Engagement with UK Power Networks ("UKPN") The draft Development Consent Order ("DCO") promoted by the Applicant includes powers relating to UKPN. However, there remains a significant lack of clarity regarding the precise nature, extent, location and justification of the proposed UKPN works affecting the Landowner's interests. Whilst reference has been made to the rerouting of existing infrastructure to facilitate the Norwich to Tilbury Project, no detailed information has been provided in relation to the specific works proposed on, or affecting, the Landowner's land. The Landowner received no communication from UKPN, nor from its appointed agent Dalcour Maclaren, until an introductory meeting was held via Microsoft Teams on 23 April 2026. That meeting was attended by and and from Dalcour Maclaren on behalf of UKPN and from Savills on behalf of the Landowner. The meeting was introductory in nature and did not provide the detailed information required by the Landowner to understand the implications of the proposed works. Since that date there has been no further meaningful engagement by UKPN nor their agents, Dalcour Maclaren. A site meeting is now scheduled to take place on 17 July 2026, involving representatives from UKPN, Dalcour Maclaren, Savills and the Landowner. Notwithstanding that forthcoming meeting, the current position remains that UKPN is seeking extensive powers over private land without having adequately engaged with the Landowner or provided sufficient information regarding the impact of its proposals. Engagement Aside from the meeting referred to above concerning Heads of Terms, there has been no further meaningful engagement by either the Applicant or UKPN. The Landowner finds this lack of engagement surprising and deeply concerning given: The significant and long-term impact the proposals will have on the farming business; The scale of the proposed infrastructure crossing productive agricultural land; The extent of the compulsory acquisition and rights powers being sought; and The requirement under the Planning Act 2008 framework for applicants to demonstrate a compelling case in the public interest for the acquisition of private rights and	*Heads of Terms* The Applicant notes the comment regarding 'positive progress' made on the Heads of Terms. The latest iteration of the HOTs version 3 template was issued to the APs agent on 13th July 2026 which has been updated to reflect many of the negotiated points made by the APs agent, the most recent meeting for which took place on 19th June 2026. There is a further meeting scheduled with the APs and Applicant's respective agents scheduled on 22nd July 2026 to further negotiations on the HOTs and discuss site specific matters. The Applicant wishes to draw attention to the HoT engagement set out above in this document, in response to REP6-174, to further demonstrate the progress being made with the agents. The most recent meeting including the AP, in addition to their agent and Fisher German took place on 5th March 2026 and subsequently the Applicant has offered further on site meetings, through their agent, which are yet to be agreed by the AP. The AP's agent has requested more detail on broad matters such as soil management plans, land drainage plans, reinstatement strategy, haul road design and construction and attenuation ponds, design and construction. The detail on these points will be shared as they become available during the detailed design process. The Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and regular twice weekly meetings are conducted to triage. These meetings identify common themes across PILs and identify and seek the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process and does not anticipate that the register will close for requests and consideration in the future. The focus at this time continues to be the matters that should be negotiated as part of HoTs rather than simply practical matters that would be dealt with through the usual agricultural liaison / pre-entry schedule of condition workstream at the commencement of main works. *UKPN engagement* The APs comments confirm that two site meetings have taken place on 23rd April and 17th July 2026. The Applicant does not agree that there has been an absence of engagement regarding UK Power Networks' (UKPN) works. As explained during the Examination, UKPN has commenced detailed design studies for the diversion of affected assets and has been engaging directly with affected landowners in relation to those works. The Applicant recognises the importance of understanding the interaction between the Proposed Development and UKPN diversion works and has therefore sought to facilitate coordinated discussions where appropriate. The Applicant has continued to engage with Cullum Agri Ltd and TA Cullum Contracting Ltd and its agent regarding the Proposed Development, including through ongoing Heads of Terms negotiations and discussions concerning mitigation and accommodation works. Engagement remains ongoing and the Applicant will continue to work with both the Affected Person and UKPN to ensure that information is shared and concerns are considered as the design progresses. The Applicant remains committed to progressing Heads of Terms discussions and reaching agreement with Cullum Agri Ltd and TA Cullum Contracting Ltd.

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		interests. The Landowner remains willing to engage constructively. However, meaningful progress cannot be achieved in the absence of detailed information and genuine engagement from those seeking powers over the Landowner's property. Conclusion The Applicant submitted its application for a DCO on 29 August 2025, including powers for compulsory acquisition and the acquisition of rights over substantial areas of the Landowner's holding. Nearly a year later, significant concerns remain unresolved. There continues to be a lack of essential information regarding both the Applicant's proposals and the proposed UKPN works. Furthermore, meaningful engagement has been limited and insufficient to address the substantial impacts that the proposed development would have on the farming business. Accordingly, in these circumstances, the Landowner considers that the proposals, as currently presented, remain unjustified insofar as they affect the Landowner's land and interests.	
REP6-234	Simon Alan Bryan	I strongly support the views stated at the hearings by our MP James Cartlidge and agree with him that residents have not been able to compare proper options for the entire route and technology options. As a home owner adjacent to the proposed route, I believe that an off shore route or HVDC solution is preferable to the AC pylons and underground solutions across the countryside of East Anglia. This electricity supply line serves London and does not offer any benefits to East Anglian residents to off set the damage to our countryside; our property values and our peaceful country life.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The **5.15 Design Development Report [Revision B]**, paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
REP6-146	Conrad Energy	NORWICH TO TILBURY DCO APPLICATION CONRAD ENERGY DEADLINE 6 SUBMISSION This document sets out Conrad Energy's deadline 6 submission in respect of National Grid Electricity Transmission plc's ('the Applicant') application for development consent for the proposed Norwich to Tilbury Project ('the Project'). Conrad Energy submitted a Relevant Representation [RR-0695] on 25 November 2025 outlining its concerns about the Project. Conrad Energy has an option for lease over land within the draft Order Limits for the purpose of developing a proposed solar PV project for which full planning permission has already been granted. Whilst Conrad Energy recognises the need for the Project and does not object to it in principle, Conrad Energy has a number of outstanding concerns about the interface between the Project and its own proposed solar development and the proposed compulsory	Discussions regarding Conrad Energy's interests are ongoing, and the parties are currently engaging to better understand potential impacts and any measures that may be available to address them. The Applicant does not currently accept that the Project would result in serious detriment to Conrad Energy's undertaking under section 127 of the Planning Act 2008. To date efforts to acquire land interests voluntarily focus on the freeholder. Conrad Energy's land interest is as a leasehold occupier (CAT 2). The Applicant's policy for land negotiations is to first focus on CAT 1 freehold interests, freeholders then gain occupiers consent under the voluntary agreement. In respect of the other interface concerns raised: • Permanent Impacts on Panel Layout: Two proposed tower locations interface with the Conrad Energy development site: one to the south and one to the north. The southern tower is located at the edge of the Conrad development and is expected to have only a minimal long-term impact on the site layout and generating capacity.The northern tower will create a reduction in the area available for solar panels as a result of the required safety stand-off distances. However, this impact is limited in extent and represents a relatively small reduction when considered against the overall scale of the proposed solar development. Notwithstanding this, the Applicant has raised a design change request to investigate whether the tower can be relocated further west within the Limits of Deviation (LoD) to further reduce impacts on Conrad Energy's scheme. Conrad Energy has shared a layout indicating that panels may be omitted from their layout beneath the overhead conductors. The

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		acquisition and temporary possession powers sought over land in respect of which Conrad Energy has an interest. The exercise of the powers sought may adversely affect not only the development, operation and generating capacity of Conrad Energy's development, but also the ongoing investment position. Two Conrad Energy entities (referred to jointly as, 'Conrad Energy' in this submission) have various interests in land within the draft Order Limits over which the Applicant is seeking compulsory acquisition and temporary possession powers; Conrad (Billericay) Limited (PIL Reference ID:14520) and Conrad Energy (Developments) Limited (PIL Reference ID: 15819), as set out in the Applicant's Book of Reference. To date, the Applicant has not made any meaningful efforts to voluntarily acquire Conrad Energy's interests. Conrad (Billericay) Limited holds a generation licence and is therefore a statutory undertaker. Conrad Energy considers that the Project will cause serious detriment to its undertaking (as per s.127 of the Planning Act 2008) because it will limit (potentially severely or entirely) its ability to operate its proposed solar development. The Applicant and Conrad Energy have been developing a draft Statement of Common Ground ('SoCG'), however, a number of unagreed matters remain, including: • The Project will result in a permanent loss of part of Conrad Energy's development footprint resulting in an inability to achieve its full generation capacity; • The Project will result in the additional temporary loss of solar panels within Conrad Energy's development. Conrad Energy requires formal protection of its assets. Furthermore, the removal of panels will result in a further loss of generation capacity; • Conrad Energy is concerned about the Project's earthing impacts, operational impacts and shading impacts on its proposed solar development; and • Conrad Energy has requested a change to the proposed temporary haul road access within its development site. Conrad Energy remains concerned that there is no agreed resolution to the above issues and Conrad Energy would like commitments from the Applicant to address these issues including by the completion of a legal agreement. Whilst the Applicant has indicated it will be proposing heads of terms for an agreement with Conrad Energy, Conrad Energy is still waiting to receive these. As there is currently no such agreement in place,	Applicant has confirmed that this restriction is not required by National Grid, and there are numerous locations where solar developments are proposed or pre-existing beneath overhead line conductors. • Temporary Construction Impacts: Construction activities will require temporary access to the tower locations via haul roads, together with temporary construction compounds around the tower bases.Tower construction is expected to take approximately six months at each location and will require the temporary removal of a limited number of solar panels within the affected working areas. The haul road is anticipated to remain in place for a longer duration than the tower compounds.The Applicant is exploring the relocation of the northern tower further west within the LoD. Should this be achievable, it would reduce the extent of temporary impacts associated with both the haul road and construction compound on the Conrad Energy development. Conrad Energy previously raised concerns that conductor stringing activities could require the removal of a significant area of solar panels. The Applicant has since developed an alternative construction approach that avoids the need for a large pulling area within the site. As a result, the extent of temporary panel removal required for conductor installation is expected to be substantially reduced. Details of this approach have been shared with Conrad Energy. • Shading Impacts: The Applicant has provided further information on the proposed tower specifications and will continue to provide additional details as these become available to support Conrad Energy's assessment of potential shading impacts.Based on the current design, any shading effects are anticipated to be limited given the lattice structure of the towers and the significant height of the conductors passing over the site. Nonetheless, the Applicant will continue to engage with Conrad Energy as further design information becomes available. Earthing: It is possible that modifications to Conrad Energy's earthing system may be required due to the proximity of the proposed overhead line infrastructure. National Grid has requested details of Conrad Energy's earthing design and will review this information as soon as it is made available. Should upgrades be required, National Grid will work collaboratively with Conrad Energy to identify and agree an appropriate solution. • Other Operational Matters: No further operational concerns have been raised by Conrad Energy through the Statement of Common Ground discussions to date. The Applicant remains committed to reaching agreement with Conrad Energy and is awaiting an initial list of key issues to be covered by such agreement from Conrad Energy's solicitor for the purpose of populating draft Heads of Terms to facilitate resolution of the remaining matters wherever possible.

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		and until satisfactory protections are secured, Conrad Energy maintains its objection to both the compulsory acquisition and temporary possession powers sought by the Applicant in respect of land Conrad Energy has an interest in. 99271490.1	
REP6-147	Essex County Council	Highways and Transportation ECC commentary on the further submissions received by Deadline 5 are available in Appendix A.	See response in Appendix D of this document
REP6-147	Essex County Council	Ecology ECC is aware that the Outline Code of Construction Practice (CoCP) and the Landscape and Ecological Management Plan (LEMP) are currently being updated for submission by the Applicant at Deadline 6 of this Examination. It is expected that these updates will include text as agreed with the Applicant and their consultants at a meeting on 11th June 2026. 1.3. The Outline LEMP should include (somewhere from section 6.1.4): 'Where no bat roost has been identified during surveys, but removal of a potential roosting features is necessary (either PRF-I or PRF-M), compensation measures will be provided to preserve the overall bat roosting resource of the local area in the short term. A provision of bat boxes and/or veteranisation of retained trees, equating to 10% of the total number of trees with potential roost features to be removed, will be provided across the Project. The bat boxes to be installed will be made of either woodcrete or woodstone, to ensure durability, and be suitable for use by a range of bat species. Suitable examples include the Schwegler 2F bat box that is suitable for the smaller UK bat species, Schwegler 1FF bat box suitable for both smaller and larger UK species and Schwegler 1FD bat box with internal panels suitable for small crevice dwelling species. Project The compensation features (boxes or veteranisation) will aim to be distributed across the (Sections A – H), although not necessarily in equal proportions. Compensation feature locations will be selected by the Ecological Clerk of Works (ECoW) based on professional judgement of site suitability and the potential for greatest benefit. The following considerations will inform the final siting of the compensation features across the Project: • boxes/veteranisation should primarily be located in the vicinity of PRFs that have been removed as part of the Project; • the context of retained roost resource in an area should be considered. Where there is already a high availability of PRFs in an area, boxes should be located in alternative suitable locations to improve	The Applicant can confirm that the agreed wording regarding bat boxes and ECoW suitability has been included within the **7.4 Outline Landscape and Ecological Management Plan [Revision G]**.

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		roosting opportunities in areas of lower roost resource; • boxes/veteranisation should be sited in unlit habitats with good connectivity to available bat foraging habitats in the wider landscape; • boxes will be installed on suitable retained mature trees within the Order Limits or outside the Order Limits via voluntary agreement with the relevant landowner. • the on-site installation/creation of compensation features will be undertaken under the direction of a suitably qualified ECoW; • boxes should be fixed to mature, healthy trees, as otherwise they can be damaged in bad weather (e.g. by a falling branch); • boxes should be sited between 3-4m high; 2 • boxes should be fixed according to manufacturer guidance. They should be fixed to allow tree growth and avoid damage to the tree supporting them; • a range of different compensation features (including box types/veteranised features) should be used in different locations/aspects (particularly in terms of the amount of exposure to sun and shade) is likely to be increasingly important in the face of climate change. • boxes with vertical openings at the base are preferred as they are self-cleaning, and prevent horizontal internal areas being used by birds for nesting; • veteranisation features should be designed using the Bat Tree Habitat Key (BTHK), which provides a comprehensive database of tree roosts including roosting features, dimensions and tree species. The BTHK can be utilised to take the average dimensions of the features being lost / requiring compensation specific to species being targeted.' 1.4. 1.5. 1.6. 1.7. ECC is also expecting wording being added to the oLEMP at Deadline 6 to confirm that the Ecology Working group can review the ECoW structure and key individuals qualifications.	
REP6-147	Essex County Council	Green infrastructure 8.9.2 Applicant's Response to Second Written Questions [REP5-211] ECC notes the Applicant's response in BIO 2.14 (Table 4.1, pp.50–52), which confirms that off-site BNG site selection will prioritise alignment with Local Nature Recovery Strategies (LNRS). While this is welcomed, ECC therefore requests that the Applicant clearly demonstrate how LNRS mapping has informed the identification and selection of BNG sites and commits to securing BNG delivery that is demonstrably aligned with LNRS priorities. Also, ECC considers that the LNRS should inform the project as a whole, guiding mitigation, enhancement and compensation measures, rather than being applied solely to the delivery of off-site Biodiversity Net Gain. ECC considers that GI forms an integral part of the mitigation, enhancement and	In relation to onsite BNG to be delivered in the Environmental Areas, the Applicant detailed how each Environmental Area aligns with the relevant LNRS in response to ExQ1 BIO 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** In relation to offsite BNG, the Applicant is currently in advanced negotiations with Suffolk Wildlife Trust in relation to the potential delivery of up to 600 units at the Waveney and Little Ouse Recovery (WaLOR) Project. 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 strongly encouraged. For the other offsite biodiversity unit sites not yet identified, the Applicant has committed to taking the relevant LNRSs into consideration during the identification process. The Applicant has therefore comprehensively demonstrated how the current onsite BNG aligns with the LNRSs, how the potential purchase of offsite biodiversity units at the WaLOR site aligns with the LNRS and how the LNRSs will be taken into consideration for future offsite acquisitions. The Applicant does not consider that any further information can be provided in relation to this matter at this stage. In addition to onsite and offsite BNG which includes the Environmental Areas, the Applicant has stated that the relevant LNRS will be considered for hedgerow reinstatement (see paragraph 9.4.2) and the delivery of offsite tree planting for individual trees (see paragraph 9.3.3) as detailed in **7.4 Outline**

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		compensation strategy for a project of this scale, particularly in the context of cumulative and linear impacts. ECC therefore recommends that GI, Landscape and BNG delivery is embedded within the DCO framework and aligned with LNRS to ensure coherent, strategic and multifunctional environmental outcomes across Essex. ECC notes that, in response to LUS 2.5 (Table 9.1 Land Use, Soils and Green Infrastructure), the Applicant has not provided any new substantive information and instead refers to its previous responses in REP4-299; on this basis, ECC has no further comments to add at this stage. 7.4 Outline Landscape and Ecological Management Plan (Tracked) (Final Issue E) [REP5-157] 1.8. 1.9. 1.10. 1.11. ECC notes the updates made to the Outline LEMP (Revision E), including the addition of the Arboricultural Impacts Plan and increased detail on vegetation management, reinstatement and species mitigation. These changes are welcomed in improving the clarity of baseline impacts and proposed mitigation at a local level. However, ECC notes that these updates do not address previous comments regarding the strategic role of GI within the OLEMP, which therefore remain outstanding. In particular, the document continues to focus on site-level mitigation and reinstatement, without demonstrating how GI delivery will be coordinated as a connected, multifunctional network across the project or aligned with wider spatial priorities. ECC also notes that the OLEMP excludes the delivery of off-site BNG, which further limits its ability to secure a coherent, landscape-scale approach to biodiversity enhancement and GI provision. To strengthen the OLEMP, ECC recommends that the final document: • clearly sets out how GI will be delivered as a connected network, including how Environmental Areas and reinstatement proposals contribute to wider ecological connectivity. • demonstrates how onsite mitigation and habitat creation will complement off-site BNG delivery and wider environmental objectives; and • includes clearer principles or metrics for monitoring GI outcomes, beyond site specific establishment and aftercare measures. 7.16 Design Approach for Site Specific Infrastructure (DASSI)(Tracked) (Final Issue C) [REP5-166] ECC welcomes the inclusion of a dedicated Nature Recovery Strategies and Local Green Infrastructure Design Principle (Section 5.7) and the strengthened reference	**Landscape and Ecological Management Plan [Revision G]**. The Applicant therefore disagrees that the LNRSs have only been taken into consideration in relation to offsite BNG but notes the Council's request for further detail to be provided in the final LEMP(s). In response to comments on the DASSI submitted at Deadline 5, the seven Environmental Areas around the permanent assets (i.e. Substations and Cable Sealing End (CSE) Compounds) also offer opportunities to align with the LNRSs. The LNRSs and Local Green Infrastructure Design Principle are included to guide the detailed design process to ensure a holistic design is achieved that delivers a nature responsive approach to the Environmental Areas. The Applicant holds its position that the delivery of a wider strategic green infrastructure scheme is not necessary to make the scheme acceptable in planning terms. In response to the comments made regarding REP5-199, the purpose of the Opportunities Plans was to demonstrate that there are potential opportunities in the locations specified to deliver compensatory measures, not to be prescriptive on the exact land parcels and specific nature of the measures. The LNRSs were taken into consideration to help inform the measures identified. It is not unusual for large scale infrastructure projects to develop compensatory strategies first before securing landowner agreement in the implementation phase. This is also considered a reasonable approach given the Applicant's position on the requirement for these measures and therefore the provision of these under on a 'blue pencil' basis.

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		to maximising green infrastructure links within the updated DASSI. While these additions are positive, ECC considers that they remain framed at a high level and are not supported by clear evidence of how the Essex Local Nature Recovery Strategy (LNRS) has informed the siting, layout or spatial connectivity of Environmental Areas or wider mitigation proposals. In particular, the continued emphasis on Environmental Areas as site-level mitigation and on planting for visual screening suggests that GI is still being treated primarily as a landscape response rather than as a strategic, multifunctional network. ECC therefore maintains its position that further clarity is required to demonstrate how GI and LNRS have been embedded into the design process, including how green infrastructure links have been defined, mapped and secured to deliver connectivity beyond individual sites. GI Comments on the Norwich to Tilbury Masterplans – 1 July 2026 [REP5-199] 1.12. 1.13. 1.14. 1.15. 1.16. 1.17. While the Applicant's reference to the Essex LNRS within the masterplans is welcomed, this is limited in scope. The masterplan is for those areas identified as most impacted by the ExA, rather than across the scheme as a whole. As such, it only partially addresses ECC's previous recommendation that the LNRS should function as a supplementary strategic evidence layer to inform the identification and spatial alignment of mitigation, compensation and enhancement measures across Essex, and not solely in relation to off-site biodiversity net gain (BNG) delivery. The submitted masterplans do not demonstrate that LNRS mapping has been incorporated into the project baseline as an equal dataset for the evidence layer. In contrast to the constraint's plans, which present defined and detailed landscape, heritage and ecological information, the opportunities plans are high-level, illustrative and indicative. They are framed as providing "strategic support" only and are not used as a core analytical layer to inform spatial decision-making. The supporting text makes clear that the opportunities shown are draft and represent potential enhancements rather than measures that guide mitigation or compensation. Although Appendix D (Ardleigh) references Glebe Corner, identified by ECC as a potential compensation site currently under discussion, this appears to be an exception rather than evidence of a systematic approach. The Applicant instead emphasises delivery of the 10% BNG requirement as the primary ecological mechanism. There is limited indication that the LNRS has been used to shape a broader compensation	

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		strategy or to support landscape-scale ecological restoration in line with Essex LNRS priorities. While the text refers to opportunities for woodland, hedgerow and grassland enhancement, the mapping itself provides limited spatial clarity. Apart from general references (e.g. tree and hedgerow planting, connectivity improvements, and links to green and blue infrastructure), it does not clearly identify where specific habitat creation or enhancement, (such as grassland), would occur, nor how these align with LNRS habitat targets. Furthermore, other relevant habitat types, such as scrub, freshwater (including standing water and river buffer habitats), are not explicitly identified, although the latter habitat types may be broadly captured under “blue infrastructure”. This lack of specificity limits confidence that measures are strategically targeted to LNRS priorities. 1.18. 1.19. 1.20. 1.21. The Applicant explicitly states that the opportunities plans do not indicate agreement, and do not commit to delivery, with any measures subject to NPS policy and further consideration. In addition, no landowner discussions have taken place and many opportunities lie outside the Order Limits, meaning delivery would rely on voluntary agreement and cannot be assured. This significantly reduces the weight that can be given to the identified opportunities, particularly in the areas most affected by the Project. Although some opportunities on local authority land are acknowledged as having greater delivery potential, the overall position remains that the plans are conceptual and non-committal. The inclusion of LNRS linkages signals general alignment with strategic ambitions but does not address deliverability risk or secure outcomes. ECC therefore maintains that the LNRS should be embedded as a core spatial evidence layer within both the baseline and the identification and alignment of mitigation and compensation measures, rather than being treated as contextual support. As currently presented, the masterplans remain high-level, uncertain, and limited in their ability to demonstrate a robust, deliverable, and strategically aligned approach to environmental mitigation and compensation.	
REP6-147	Essex County Council	Outline Archaeological Mitigation Strategy/Outline Written Scheme of Investigation (OAMS/OWSI) [REP5-161] A revised version of the outline archaeological mitigation strategy and outline written scheme of investigation (OAMS/OWSI) was provided at Deadline 5 (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Tracked)(Final issue B) [REP5-161]. A number of changes have been	Please refer to the Applicant’s response to Thurrock Councils comments on this point above.

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		made in line with ECC recommendations. There remain only a few outstanding issues, detailed comments on which have been provided direct to the archaeological consultants as requested. The remaining issues relate to the geoarchaeological investigations, the trial trench proposals and proposed mitigation. 6 Geoarchaeology 1.22. 1.23. 1.24. 1.25. 1.26. 1.27. There is a lack of sufficient detail on the potential methodologies that could be employed as part of the geoarchaeological assessment and mitigation. Currently the OAMS/OWSI states: 5.3.24 * The methodology by which the characterisation of deposits with palaeoenvironmental/geoarchaeological potential is achieved will be set out in the relevant DWSI and may include, but not be limited to, mechanical test pitting within archaeological trial trenches and the monitoring of G.I. works Requirement 5 of the DCO states that the detailed WSIs (DWSI) need to be in accordance with the OAMS/OWSI. This would necessitate the incorporation of a full range of geoarchaeological investigations that may be required as mitigation in sufficient detail in the OAMS/OWSI. No details on alternative methodologies are provided within the OAMS/OWSI document therefore there is no basis or standards set for the techniques which would be expanded upon in the detailed WSI's. Until further geoarchaeological assessment is completed and the impacts understood the most appropriate geoarchaeological methodology for characterisation of the deposits with palaeoenvironmental/geoarchaeological potential is not fully realised therefore the most appropriate mitigation technique has not been determined. The main methodology proposed for geoarchaeological mitigation is borehole investigation, adequate detail for this methodology is provided within the OAMS/OWSI. In other areas of the scheme where impact may be deeper, such as SUDS, undergrounding of cables or HDD drill pits, a more suitable methodology may be geoarchaeological test pits or geoarchaeological trenches. These methods should allow more suitable recording of geoarchaeological deposits such as buried soils and palaeolandsurfaces that would not necessarily be deeply buried and may have a substantial lateral extent. For the area of the river crossing a geoarchaeological trial trench may be more appropriate as mitigation as this would allow investigation of the full site stratigraphy over a wider area and allow concurrent investigation of potential archaeological remains. It is acknowledged that any deposits of high 7 significance that are located at a significant depth would need to be	

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		investigated through borehole survey. 1.28. 1.29. 1.30. 1.31. The agreement of the OAMS/OWSI within the determination period is critical to the undertaking of appropriate and timely archaeological and geoarchaeological mitigation post consent. For the OAMS/OWSI to be considered as a comprehensive outline strategy for geoarchaeological investigation it should include a wider range of potential geoarchaeological methodologies that could be required as mitigation for the scheme. At present the methodology for geoarchaeological assessment and mitigation is vague and the OAMS/OWSI does not incorporate the full range of geoarchaeological investigations that could be required as mitigation. The OAMS/OWSI has not been approved and is not yet considered adequate as a control document. Archaeological evaluation trenching The principles and scope of the Phase 2 trial trench evaluation methodology have been agreed previously in discussion with the archaeological consultants. The location of the trenches has been provided directly as digital data and is currently under review. It was previously recommended that the OAMS/OWSI should only identify the general areas for Phase 2 trenching within the Red Line Boundary that would require evaluation due to potential design changes which may impact the location of the proposed trial trenches. Detailed Phase 2 trenching has been submitted for approval, the trenching should include all areas where project impacts have been identified, including (but not limited to) pylon bases, access roads, SUDS, drainage, pulley locations etc. The trial trenches should be located to target these areas of identified impact as well as any potential archaeological features identified through geophysical survey and/or aerial photography. To assess the proposed trial trench locations the most up to date design information needs to be made available to determine areas of impact. Once this information is provided the trial trench locations can be reviewed. The results of the review will be reported back to the archaeological consultant directly. Mitigation Areas A number of documents for archaeological mitigation have been submitted at Deadline 5. These include Volume 8: Examination Documents (June 2026): 8 • 8.21 Detailed Written Scheme of Investigation – Mitigation areas 124, 136 (a & b), 137, 138, 141 & 142 Final Issue A (REP5-220) • 8.22 Detailed Written Scheme of Investigation – Mitigation areas 126, 128 (a, b & c) & 140. Final Issue A (REP5-221) • 8.23 Detailed	

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		Written Scheme of Investigation – Mitigation areas 109, 110, 111, 112 (a & b) &139. Final Issue A (REP5-222) • 8.24 Detailed Written Scheme of Investigation – Mitigation areas 113 (a & b), 114 & 115. Final Issue A (REP5-223) 1.32. 1.33. 1.34. The documents submitted are not acceptable in their current form, further information has been requested directly to the Applicant to facilitate full consideration of the mitigation proposals. The sites proposed for mitigation have not yet been discussed or approved by the archaeological advisor and there has been limited time since submission to consider these documents. It is considered inadvisable to secure mitigation at this stage of the application due to time constraints.	
REP6-147	Essex County Council	Landscape ECC has welcomed the consideration given by the ExA on matters regarding landscape, including further discussion at the Issue Specific Hearing 4. ECC has been reviewing the material provided by the Applicant and engaging meaningfully in order to ensure necessary landscape mitigation and compensation is in place to respond to the considerable impacts arising from the project. An update on landscape and visual matters will be presented as part of the final signed Statement of Common Ground to be submitted at Deadline 7. Furthermore, ECC will look to confirm its case for landscape compensation, in addition to the comments below, as well as detailing any outstanding matters as part of its Closing Statement at Deadline 8.	Noted
REP6-147	Essex County Council	Draft Development Consent Order (3.1 Draft DCO (Tracked) (Final Issue E) (REP5-061) Appendix B of this response provides an update to the Deadline 3 ECC Response Appendix 2 – Table on Revised dDCO [REP-082] for the ExA information. The changes which have been made have been presented as track changes to evidence where matters have progressed. ECC would raise concern with the ExA that there continues to be a significant number of issues which remain unaddressed with the Applicant. 9 1.35. ECC will continue to progress the commentary on the DCO within relevant sections of the SoCG. 1.36. 1.37. 1.38. 1.39. 1.40. ECC would also wish to provide technical commentary on the DCO regarding archaeology and green infrastructure. Archaeology The revised DCO wording for Requirement 5 (Archaeology) has included a new part (6) which satisfies the recommendations requested by ECC to ensure the delivery of an adequate programme of post-excavation works and publication.	Please refer to the Applicant's response to Thurrock Council's comments on this point above.

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		The wording of Requirement 5(6) is considered acceptable. The re-worded sections (parts 1 to 3) have tried to incorporate the various requests of the relevant planning authorities to provide suitable re-wording for the DCO. However, the result is that the new proposed wording is confusing and does not reflect the proposals put forward by ECC which was to provide a distinction between the undertaking of the archaeological evaluation works and the subsequent mitigation works. This was to facilitate a clear process for the discharge of condition procedures. The DCO wording has been discussed previously with the relevant county archaeological officers, comments were prepared for the Second Hearing regarding Requirement 5 however they were not delivered during the Hearing. It is recommended that the wording provided by Suffolk County Council for the Hearing be adopted rather than repeat or provide alternatives at this stage of the application. Following their rationale would lead to fewer subsections and ensure greater clarity for discharge of conditions. Green Infrastructure ECC welcomes the clarification in Schedule 3, Requirement 1 (Interpretation), which confirms that planting associated with the 3:1 tree planting commitment (to the extent it is delivered within the Order Limits) is captured by the Order.	
REP6-148	Fordham Parish Council	NG are still not playing by the rules and still fobbing us off with “smoke and mirrors.” Specifically, the requirements of NPS-EN5, the Dedham vale area should not be crossed or tunnelled under at all. There is no way that a power line can be built through the area without lasting and permanent harm. … To reiterate: “As per the requirements of NPS-EN5 this area needs to be “avoided altogether” due to the impact of the proposals on the Dedham Vale and its setting, noting that “even residual impact is unacceptable in planning terms” per NPS EN-5 and that failing this an extension of the underground route, using HVDC cables would be the only acceptable solution to mitigate harm to both the Vale and the Colne Valley.”	The Applicant has responded to similar concerns raised by Villages Against Pylons at REP6-172. It is important to note that neither EN-1 or EN-5 include a policy presumption that nationally designated areas should be ‘avoided altogether’. The development of the Projects by the Applicant is undertaken within the context of the relevant Planning policy. In this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. Within the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [Revision B]** and **5.6 Planning Statement [Revision B].** The Project has therefore complied with the relevant EN-5 policies on undergrounding.

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REP6-148	Fordham Parish Council	It would also be a travesty to run pylons or underground cables through the Colne valley through Fordham and Aldham. There have been two, independent Landscape assessments for the area and we agree, wholeheartedly with their findings. I don't need to remind you, but will, of the historic heritage that the valley contains; remains and evidence of human habitation have been found from the medieval period back to Palaeolithic times. That's more than twelve thousand years of history. The valley is a big tourist draw, regularly frequented by rambling and cycling groups, NG's plans will seriously curtail these activities and the Three Horseshoes in particular will suffer a significant loss of custom when the footpaths and roads are shut or diverted. The permanent visual impact of pylons and temporary (years?) scaring of the valley by AC cable laying, not to mention the destructive and disruptive impact on our already struggling roads, will have a lasting effect on the well-being of residents and visitors alike. The Colne valley is picturesque, beautiful and teeming with highly diverse flora and fauna, it should stay that way. The Colne valley, although not listed as an ANOB, is a continuation of the Dedham Vale, is as important and valuable, it should and must be treated as such.	The Applicant has responded to similar landscape and visual related concerns above as raised in REP6-172 by Villages Against Pylons and REP6-175 Aldham Parish Council. *Public Rights of Way* The overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [Revision D]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions. The Applicant confirms that no PRoW within the vicinity of the Colne Valley, Fordham and Aldham would be closed without a diversion in place, and no severance of the overall network is anticipated. Where temporary diversions are required, they have been proposed along the shortest practicable route, taking account of existing land boundaries and features. Following completion of the works, all PRoWs temporarily affected will be reinstated to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre and post-construction condition surveys *Heritage* The impact of the Project on the historic environment of the Colne valley has been assessed and the conclusions of the assessment is reported in documents **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The Applicant considers the assessment to be proportionate and appropriate within the DCO framework. The archaeological potential of the Colne valley has been assessed in the documents noted above and by geophysical survey (**6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**). The geophysical survey is to be followed by archaeological trial trenching the results of which will determine the requirement or not for further mitigation. There is a robust process in place to ensure the archaeological record is treated appropriately, details of which can be found in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**. *Socio-economic impacts* An assessment of the potential impact of the Project on the tourism economy is provided in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision C]**. This concludes that although construction traffic noise and changes in journey and amenity at particular locations are anticipated as a result of the Project, these effects are unlikely to deter visitors or substantially alter the appeal of the destination for tourists. Effects are concluded as being temporary, short-term and negligible. Mitigation and management measures for footpaths and roads during construction are set out in **7.6 Outline Public Rights of Way Management Plan [Revision D]** and **7.3 Outline Construction Traffic Management Plan [Revision F]** respectively. For the majority of PRoW in the Fordham area, effects are short-term (1 to 3 days); where PRoW in this area are affected for a longer period (up to 2 months), temporary diversions would be identified to enable continued use. In terms of construction traffic, **7.3 Outline Construction Traffic Management Plan [Revision F]** notes that, in accordance with mitigation measure GG35 in **7.2 Outline Code of Construction Practice [Revision G]**, local businesses will be kept informed regularly of the works through active community liaison, including notification of heavy traffic periods. In the event that any traffic diversion routes are required, temporary signage will be installed in accordance with relevant signage design guidance.

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REP6-148	Fordham Parish Council	If NG had gone with the offshore option in the first place they would have had no opposition, no massive mitigation and compensation costs, no court cases (there will be!) and the project could have started and delivered on time.	**5.15 Design Development Report [Revision B]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.
REP6-237	William Petersen	We, at Burstall, still feel [that there are areas that] have not been correctly addressed by NGET - whilst responses have been received, the responses repeat previous statements and actually don't answer our concerns and show no evidence of engagement to fully understand the impact to Burstall or mitigate in any way. The total resilience gap is alarming and is covered by other questions: • impact of this project and cumulative impact on Burstall and wider area greatly understated; • wider historic and rural context of Burstall and surrounding areas ignored (the wider settings of Canes Farm, Roman archaeological find, Burstall Hall & Moat, St Mary's Church)	Environmental impacts of the Project are reported in Volume 6 of the DCO application and assessment methodologies follow standard guidance and practice agreed within **6.20 Scoping Opinion [APP-297]**. The Applicant disagrees that impacts are under reported. Intra-project and inter-project Cumulative Effects are reported in **6.17 Environmental Statement Chapter 17 – Cumulative Effects (Revision B)** using standard methodologies that adhere to **6.19 Scoping Report [APP296], 6.20 Scoping Opinion [APP-297]** and also the Planning Inspectorate's Advive Note 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (2024). The Applicant disagrees that impacts are under reported. Burstall Hall (3114) and the associated moat (3103) are reported in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**. The setting of these low value assets was not considered in line with the agreed methodology set out in **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. The medium value Grade II listed Canes Farmhouse (1036949) and associated low value farmstead (3052) were reported in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**. As a medium value listed building, the setting of Canes Farmhouse was considered but it was concluded that the setting of the asset does not extend to the Order Limits and so it was omitted from further assessment. The setting of the Grade I high value Church of Saint Mary (1036948) was reported in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** and fully assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The Applicant is confident that the results of the assessment are proportionate and appropriate. It is not clear as to what "Roman archaeological find" the IP is referring to, however, the nearest to the assets previously noted is a low value scatter of Romano-British pottery (3020) c. 380 m east of Canes Farmhouse. The asset is reported in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** but as the low value asset (3020) is located outside the Order Limits it is not considered further.
REP6-237	William Petersen	• no evidence that practical and pragmatic alternatives for route out of Bramford Substation adequately considered (eastern exit from substation, and use of lower ground east);	As per response Ref No. 9-5.300 of **5.1 Consultation Report [Revision B]** "*The position of JC1 to JC4 is dictated by the layout of the existing substation, substation extension and other adjacent infrastructure. Any movement to the east is restricted by the presence of other lower voltage substation infrastructure."* To clarify further the eastern part of the existing Bramford Substation is owned and operated by UK Power Networks (UKPN) and is not suitable to facilitate the 400 kV requirements of the Project. Significant re-build and likely further extensions would be required to make it compatible. Additionally other options to route from the east of the existing substation are restricted by

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			the presence of Bullen Wood ancient woodland positioned directly adjacent the eastern edge of the existing substation and Round Wood / Elm's Grove ancient woodland positioned south of the substation. The proposed JC route overhead line has been routed in the gap between the two woodlands. Any overhead line entries to the west of the substations are restricted by the presence of the Bramford to Twinstead Project overhead line entries.
REP6-237	William Petersen	• no NG ownership of issues with the wider infrastructure estate despite the wider infrastructure estate being directly related to their reinforcement projects (Scottish Power, Brunfort BESS etc etc); • no consideration of realistic worst case scenarios leading to site outage; • failure of policies and regulations with regard to resilience meeting the needs of today's world • outdated threat and scenarios assessments across a much more complex infrastructure network, with less understanding of risk across novel and new technologies; • no consideration of considerable H&S risk to local population.	The Applicant refers to its responses relating to security and resilience as raised by Burstall Parish Council, under REP6-143 of this document. Major accident and disaster risks including health and safety are managed throughout the lifecycle of the Project through a comprehensive framework of statutory duties, industry standards and National Grid management systems. These requirements apply from project development, through construction and commissioning, and into the operational life of the asset, ensuring that hazards and security risks are identified, assessed and controlled using recognised good practice and proportionate risk management measures. The Project will be delivered in accordance with the relevant legislative and regulatory framework, including the Health and Safety at Work etc. Act 1974, the Construction (Design and Management) Regulations 2015, the Electricity at Work Regulations 1989, the Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR), together with the relevant provisions of National Policy Statement EN-1. These requirements are supported by National Grid's established engineering, governance, assurance and operational management systems, which collectively provide the framework for the planning, design, construction, operation and maintenance of the electricity transmission network. In addition to compliance with these statutory requirements, the Project has been developed within the wider regulatory and engineering framework applicable to the national electricity transmission system. Security, resilience and operational continuity are not considered solely at the level of individual assets, but through the design and operation of the wider transmission network. The reinforcement provided by the Project is intended to increase network capability and resilience, supporting the secure transfer of electricity across the system whilst maintaining appropriate levels of redundancy and operational flexibility. Whilst connected generation and storage developments, including offshore wind, solar and battery storage projects, are promoted and operated by independent third parties and remain responsible for meeting their own statutory, regulatory, security and resilience obligations, the Applicant has considered the interaction of the Proposed Development with the wider transmission network through established planning, engineering and operational processes. A key stage is the transfer of the completed asset into National Grid's operational management regime following commissioning. At that point, the asset becomes subject to established inspection, maintenance, asset management, operational assurance and compliance processes, together with periodic review of emergency response and resilience arrangements throughout its operational life. The information provided above describes the governance framework within which security, resilience and operational risks are managed. It does not include the detailed content of site specific risk assessments, security arrangements, emergency response plans or incident management procedures. Those assessments and arrangements are developed, maintained, tested and implemented in accordance with the applicable statutory and regulatory framework and established National Grid procedures but are not appropriate for publication because of the sensitive nature of information relating to the security and resilience of the national electricity transmission network.
REP6-153	Lower Thames Crossing	As a result of the conflicting proposals, but to enable the collaborative and integrated delivery of both projects,	The Applicant welcomes the ongoing engagement with LTC and is confident that the interfaces between the Projects can be appropriately addressed through the detailed design process. The Applicant and

Examination Library ID	Name	Matter	NG Response
		the project teams have been meeting regularly to discuss how this can be suitably addressed. This engagement is continuing but it is becoming apparent that, due to the detailed and complex extent of the project interfaces, and given the outline level of design and construction information currently available from the NTT Project, a detailed agreement between the parties which resolves NH LTC's areas of concern is not likely to be reached before the end of examination. Having reached that position NH LTC is now in a position to advance the specific drafting amendments it requires to the NTT DCO to address its concerns, as follows.	LTC have agreed that the pragmatic approach is to enter into a legally binding agreement containing appropriate provisions and mechanisms to manage the interfaces between the Projects, however, the Applicant agrees that this is unlikely to be finalised before the end of the examination. The Applicant has reviewed LTC's proposed DCO drafting submitted into the examination at Deadline 6 **[REP6-153]** and has incorporated the relevant provisions into **3.1 Draft DCO [Revision G]** to be submitted at Deadline 7, with the exception of LTC's proposed Protective Provisions, which have been incorporated, with amendments, within Part 17 of Schedule 16 to the Draft DCO. A detailed justification as to the substantive changes sought by the Applicant to those protective provisions is included within **8.7 Statutory Undertaker Tracker [Revision F]**.
REP6-153	Lower Thames Crossing	LTC project environmental commitments The Applicant's scheme, should it be consented, would significantly conflict with the LTC environmental proposals in and around the proposed Tilbury sub-station, in particular in relation to the creation of a 21-hectare nitrogen deposition ("N-dep") compensatory habitat at the Hoford Road site, which is a commitment in section 6.10 of the LTC Outline Landscape and Ecology Management Plan, secured under Requirement 5 of Schedule 2 to the made A122 (Lower Thames Crossing) Development Consent Order 2025 ("the LTC DCO"). Approximately 16 hectares of the 21-hectare N-dep site at Hoford Road are included in the NTT DCO application for delivery of the Tilbury sub station and adjacent works, meaning that only 5 hectares is unaffected by the NTT DCO as shown on the plan below.	The Applicant acknowledges that the construction of the NTT Project would render LTC's compliance with certain ecological commitments under the LTC more difficult or, on occasion, impracticable. It has been working closely with the LTC Undertaker to provide suitable solutions to this issue. The Applicant has identified suitable alternative sites which have been agreed with both LTC and Natural England. LTC has requested that NTT undertake the planting of the nitrogen deposition compensation areas temporarily affected by the Project, and maintain the habitat for the 5 year establishment phase. The Applicant has accepted this request. The Applicant has reviewed LTC's proposed DCO drafting submitted into the examination at Deadline 6 **[REP6-153]** and has incorporated the relevant provisions into **3.1 Draft DCO [Revision G]** to be submitted at Deadline 7, with the exception of LTC's proposed Protective Provisions which have been incorporated, with amendments, within Part 17 of Schedule 16 to the Draft DCO. A detailed justification as to the substantive changes sought by the Applicant to those protective provisions is included within **8.7 Statutory Undertaker Tracker [Revision F].** The Applicant expects ongoing engagement with LTC as to the form of protective provisions to continue immediately following Deadline 7, with the intention of reaching substantive agreement on the same by Deadline 8. Paragraph 6 of the proposed protective provisions stipulates that, if works forming part of the Project are commenced within the interface area (as defined), the Applicant must, in consultation with LTC, carry out and complete Work No. 20 so as to create not less than 16 hectares of compensatory habitat. It is, however, proposed that this obligation will fall away if LTC does not bring forward the relevant adjacent compensatory habitat. Similarly, and as set out at Paragraph 7(3) of the proposed protective provisions, the Applicant expects that appropriate allowance will be made in due course to reflect costs incurred by the Applicant in acquiring the relevant land and rights on behalf of LTC for the purposes of that compensatory habitat relative to the costs which would otherwise have been incurred by LTC in securing the land and rights originally proposed to be acquired.
REP6-153	Lower Thames Crossing	In addition, there are a number of environmental measures secured by Requirement 5 of Schedule 2 to the LTC DCO that cannot be delivered by NH LTC if the NTT DCO is consented and commenced in the proposed Tilbury sub-station area:	The Applicant acknowledges that the construction of the NTT Project would render LTC's compliance with certain ecological commitments under the LTC more difficult or, on occasion, impracticable. It has been working closely with the LTC Undertaker to provide suitable solutions to this issue. The Applicant has reviewed LTC's proposed DCO drafting submitted into the examination at Deadline 6 **[REP6-153]** and has incorporated the relevant provisions into **3.1 Draft DCO [Revision G]** to be submitted at Deadline 7, with the exception of LTC's proposed Protective Provisions which have been incorporated, with amendments, within Part 17 of Schedule 16 to the Draft DCO. A detailed justification as to the substantive changes sought by the Applicant to those protective provisions is included within **8.7 Statutory Undertaker Tracker [Revision F].** The Applicant expects ongoing engagement with LTC as to the form of protective provisions to continue immediately following Deadline 7, with the intention of reaching substantive agreement on the same by Deadline 8. This DCO drafting appropriately deals with this concern from LTC.

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Reference	Commitment
LTC Outline Landscape and Ecology Management Plan – paragraph 6.9.5(c)	*"Provide a woodland connection between the existing woodland around the cement works and the woodland surrounding Orsett Golf Course in addition to the woodland mitigation planting along the Chadwell link"*
Figure 2.4 of the LTC Environmental Statement	Installation of a bat barn in the northern extent of the Hoford Road ancient woodland replacement site
LTC Design Principle - PLA.05 - Habitat connectivity	*"Design proposals shall prioritise improving connectivity between existing habitats wherever reasonably practicable, as defined within the Environmental Masterplan (Application Document 6.2, Figure 2.4). Fragmentation of habitats shall be reduced as far as reasonably practicable by avoiding unnecessary barriers to movement and, where necessary, including design features which allow safe passage of animals, and colonisation by plants to enhance biodiversity."*
LTC Design Principle - LSP.19 - Ancient woodland compensation	*"The ancient woodland compensation planting strategy will be designed to achieve the most ecologically beneficial woodland habitat and be in accordance with REAC reference TB28 and as shown on the Environmental Masterplan (Application Document 6.2, Figure 2.4) using the code LE8.2."*
LTC Design Principle - S10.04 - Screen planting	*"Woodland planting shall link Hoford Road (Work No. 6C) and Brentwood Road (Work No. 6D) to provide visual mitigation for users of the golf course and footpath networks to the north, in the absence of false cut earthworks. Where appropriate and within the Order Limits, existing hedgerows shall be reinforced with additional hedgerow planting."*
LTC Design Principle - S10.14 Retention of vista near Representative Viewpoint N-17	*"The detail design of nitrogen deposition compensation planting shall retain a framed long-range view south from footpath FP 45 within Orsett Golf Club, over the existing undulating landscape towards Chadwell St Mary. Refer to Viewpoint N-17 location on Figure 7.16 (Application Document 6.2)."*

REP6-153	Lower Thames Crossing	• To avoid NH LTC being put in breach of the LTC DCO, DCO drafting amendments are required to resolve the situation. Accordingly, NH LTC is now seeking amendments to the NTT DCO in order to safeguard its position (see Appendix 1). The drafting is intended to achieve the following outcomes: • To expressly record the fact that any works carried out pursuant to the NTT DCO which are inconsistent with or conflict with any provisions under the LTC DCO will not place LTC in breach of the terms of the LTC DCO. Whilst there is already general, non-specific drafting to this effect at Article 10 of the NTT DCO, the parties' view is that an express provision is necessary (and precedented). • Linked to (1), to expressly modify the terms of Schedule 2 (Requirements) to the made A122 (Lower Thames Crossing) Development Consent Order 2025 ("the LTC DCO") in order to allow LTC greater flexibility when discharging certain Requirements (e.g. Requirement 5 – Landscaping and ecology). The intention is to allow the Secretary of State for Transport to determine that obligations or	See response to line item above on this point.

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		commitments secured through those certain Requirements can be discharged or satisfied in a different way where the original means of discharge would be impracticable or incompatible due to the existence of NTT. • To expressly relieve NH LTC from the obligation in the LTC DCO to deliver the 16 hectares of compensatory N-dep habitat creation on parcels of land which fall within the NTT Order limits secured by NGET within the NTT DCO, and which therefore prevent or create uncertainty over when that habitat creation can take place. That would mean that NH LTC's amended commitment under the LTC DCO would be delivery of 5 hectares of N-Dep compensatory planting at Hoford Road. As a consequence, NGET would be expressly committed to carrying out the establishment of equivalent alternative compensatory habitat areas which are authorised within the NTT Order limits (work [20] of Schedule 1), to offset the 16 hectares of the Hoford Road N-dep site included in the LTC DCO. This commitment would be secured through Protective Provisions for the benefit of the LTC project (see Appendix 2). • To expressly relieve NH LTC from the obligation in the LTC DCO to deliver the environmental commitments set out in the table above. The consequence of this would be as follows: – in relation to the bat barn (it should be noted that this bat barn was included in this location in the event that pre-construction surveys showed that it was required as mitigation for the LTC. If surveys indicate that a bat barn is needed, it could still be delivered elsewhere in an appropriate location under ancillary DCO powers); – in relation to the other commitments in the table above, the inability for these commitments to be delivered should be treated as an adverse effect of the NTT project.	
REP6-153	Lower Thames Crossing	It is NH LTC's strong view that as the Applicant's scheme significantly conflicts with LTC's environmental proposals (a fact that has been made clear to the Applicant throughout the formulation of the Applicant's plans at pre-consultation and consultation and beyond), specifically at the Hoford Road site, it should be the Applicant's responsibility to both: • identify and secure the alternative compensatory habitat land required within its Order Limits; and	See response to previous two line items, setting out the Applicant's response on the incorporation of LTC's proposed DCO drafting and specific response in relation to provision of alternative ecological compensation.

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		• establish compensatory habitats within those plots equivalent to those which would be provided by the LTC DCO if NTT had not come forward, in order to achieve equivalent compliance with the obligations and commitments that were contained within the LTC DCO. Given the absence of detail capable of being provided by the Applicant at this stage in relation to the potential location of alternative sites and the timing of their availability, it would place an unreasonable burden on NH LTC to carry out these works. The LTC project has already appointed contractors, has established a programme for the delivery of the compensatory habitats, and is now undertaking preparatory activities to deliver them. The coming forward of the NTT proposals has created significant delivery uncertainty, the risk of abortive or delayed works, and associated costs in relation to this. Should the LTC project be expected to deliver the alternative habitat creation sites then there would be a requirement to reprogramme activities with the potential to have to remobilise resources at an unspecified future point to undertake works. It would be unreasonable to expect NH LTC to bear this burden as a result of the Applicant's proposals. Following the period of establishment of these environmental mitigation areas, which would be expected to be around 5 years, NH LTC is content to take on the ownership and long term management of the sites, as it would have done for the sites that it would have delivered but for the NTT project. NH LTC is pursuing a side agreement with the Applicant to document how this can be achieved.	
REP6-153	Lower Thames Crossing	Other Delivery Interface Issues As NH LTC has noted throughout the examination process, there are a number of construction and delivery interface issues (beyond the environmental issues noted above) including but not limited to: • delivery of transmission cables under the A122 Lower Thames Crossing alignment; • the timing of outages to enable overhead line works; • construction traffic routing; • construction site access; • land acquisition and use of overlapping plots. In its Deadline 5 submission and at Compulsory Acquisition Hearing 3 on 24 June 2026, NH LTC indicated that it would be submitting into the examination protective provisions in favour of the Lower	The Applicant agrees that there are a number of other construction and delivery interface issues including the list set out in LTC's submission. A detailed response on each of these points can be found in **8.29.8 Application under Section 127 Planning Act 2008 - National Highways Limited)**. Given the current status of design of both Projects, there is information which both parties seek from the other which it is not currently available and possible to provide. Therefore, the Applicant agrees that it is not yet possible for the two Projects to come to a detailed agreement in relation to each and every potential interface. The Applicant will continue to work with LTC to agree a side agreement to contain a mechanism for the future agreement of interface issues at an appropriate time. In relation to LTC's proposed protective provisions, please see previous line items setting out the Applicant's response as well as the detailed justifications in **8.7 Statutory Undertaker Tracker ([Revision F]**.

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		Thames Crossing Project which, in order to safeguard its position on project interface matters, it would invite the Examining Authority to include in its recommended DCO should the Norwich to Tilbury project be consented.	
REP6-153	Lower Thames Crossing	NH LTC is now in a position to submit these and is including them as part of its Deadline 6 submission. The intention of the protective provisions is to provide NH LTS with a level of assurance that the NTT proposals will not negatively affect the consented LTC works in the 'Interface Area' between the two projects. Some of these LTC works are already in the implementation stage and ongoing and NH LTC therefore consider that appropriate protection is needed to safeguard them in a similar manner to the protection afforded to statutory undertakers within DCOs. In particular, the protective provisions give NH LTC prior approval, such approval not to be unreasonably withheld, for any NTT works in the Interface Area. NH LTC considers this to be a proportionate and necessary safeguard given the lack of detail in the application relating to the works in this area and the significant impact that these works will have on LTC works which are already ongoing.	See response to line item above on this point. As explained in **8.7 Statutory Undertaker Tracker [Revision F]**and reflecting the wider narrative that the relationship between the two projects must, necessarily, remain one of close collaboration, the Applicant has sought to re-frame LTC's proposed drafting within the submitted protective provisions, such that the concept of "prior approval" is translated into one of "prior agreement". In conjunction, the Applicant has also proposed an entirely new Paragraph 3 (Cooperation) within the protective provisions which is intended to reflect the practical reality that two major nationally significant infrastructure projects, operating in the same geographical area, must coordinate effectively in order to ensure that both projects can be brought forwards successfully. It is important to emphasise, however, that the substantive pre-commencement oversight which LTC has sought in its drafting submitted at Deadline 6 is retained in full.
REP6-153	Lower Thames Crossing	Appendix 1: proposed drafting to be included in the draft NTT DCO Article 2, Article 1, New article [36A] headed, "Modification of the 2017 Regulations" to deal with the practicalities of applying the 1981 Act, Article 59, Insert new Work Number in Schedule 1 Work No. [20] – as shown on sheet(s) [X] of the works plans and being the implementation of compensatory habitats.	This drafting has been included in **3.1 Draft DCO [Revision G]** to be submitted at Deadline 7.
REP6-153	Lower Thames Crossing	Appendix 1: proposed drafting to be included in the draft NTT DCO Insert new (4), (9) and (10): Insert new (4), (9) and (10): (4) For section 4(1) (execution of declaration), substitute- "(1) The acquiring authority may execute in respect of any of the land which they are authorised to acquire by the compulsory purchase order a declaration in the prescribed form vesting the land in themselves, or in the case of land or a right that they are authorised to acquire for the benefit of a statutory undertaker or local authority or the LTC Undertaker, in the statutory undertaker or local authority in question or the LTC Undertaker, from the end of such period as may be specified in the declaration (not being	Equivalent drafting has been included in **3.1 Draft DCO [Revision G]** to be submitted at Deadline 7. The text included has been amended slightly to make clear that more than one general vesting declaration can be executed in relation to any individual plot of land. The Applicant considers that its drafting is no less advantageous to LTC than LTC's proposed drafting.

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		less than 3 months from the date on which the service of notices required by section 6 is completed).” (9) In section 8 (vesting, and right to enter and take possession), after subsection (3), insert- “(4) In this section references to the acquiring authority include any statutory undertaker or local authority or the LTC Undertaker referred to in section 4(1).” (10) In section 10(1) (acquiring authority’s liability arising on vesting of the land), after “vested in an acquiring authority” insert “or a statutory undertaker or local authority or the LTC Undertaker.	
REP6-153	Lower Thames Crossing	Appendix 2: proposed protective provisions to be included in the draft NTT DCO Application.	The Applicant has reviewed LTC’s proposed Protective Provisions **[REP6-153]**, including their request for prior approval over the interfacing land. The Applicant cannot, as a matter of principle, accept a prior approval mechanism which could inhibit the delivery of the Project. The Applicant has therefore submitted its own proposed Protective Provisions at Deadline 7 (**3.1 Draft DCO [Revision G]**), promoting a reciprocal prior agreement mechanism. A detailed justification as to the substantive changes sought by the Applicant to LTC’s protective provisions is included within **8.7 Statutory Undertaker Tracker [Revision F]**. The Applicant expects ongoing engagement with LTC as to the form of protective provisions to continue immediately following Deadline 7, with the intention of reaching substantive agreement on the same by Deadline 8.

3. Comments on Responses to Rule 17 Letter received 30 June 2026

3.1.1 On the 30 June 2026, the ExA issued a Rule 17 Letter **[PD-029]** with a Request for further information from the applicant and all local authorities relating to matters deferred from issue specific hearing 3 (draft development consent order) and issue specific hearing 4 (socio-economic matters). Table X.X is the Applicant's comments on responses from all local authorities to that letter.

Table 3.1 Applicant's Comments on responses from Local Authorities to Rule 17 Letter dated 30 June

Examination Library ID	Name	Matter	NG Response
REP6-147	Essex County Council	**1. Draft development consent order (DCO) matters deferred from issue specific hearing 3 Agenda item 5.2 (Schedule 3 requirements and Schedule 4 discharge of requirements):** **Response to Part a** ECC would support the inclusion of requirements that require the approval of relevant key management plans especially the Employment and Skills Plan as set out in Paragraphs 4.12-4.14 below. ECC feels such a requirement is directly linked to matters that the relevant authorities are best placed to understand and it therefore follow that they feed into the substance of the plan. **Response to Part b** ECC shares the concerns of ExA in respect of the need to mitigate for the intra project cumulative effects as well as inter-project cumulative effects, which in certain locations have the potential to be significant for local communities and businesses if not appropriately managed and mitigated. This is summarised in in Paragraphs 4.4.1 – 4.4.16 of the Council's LIR [REP1-161]. Moreover, ECC imagine that the fact that National Grid's own team considered an express intra-project commitment necessary on a materially similar linear project (Sea Link) is evidence that the generic, design-embedded/outline-CoCP approach was regarded as insufficient. ECC would therefore welcome the inclusion of a similarly worded commitment in the oCoCP similar to that proposed as GG40 in the Sea Link DCO examination although broadened to capture inter-project cumulative effects. Requirement 4 secures the CoCP to be "substantially in accordance with the outline CoCP", but it secures nothing about intra-project cumulative effects unless the oCoCP itself contains a GG40 style commitment. Without an approval gate there is no mechanism requiring assessment of the combined effect of concurrent activities across stages on a common receptor. ECC is of the opinion National Grid that the inclusion of such a requirement would complement the commitment from the Applicant to the Developer Forum where such matter can be discussed prior to submission and approval. The following is an extract form the current iteration of the draft outline Construction Traffic Management Plan (oCTMP)[REP5-149]. *Coordination with Other Developments/Events National Grid will ensure liaison takes place by the Main Works Contractor(s) with LHAs and National Highways and other developments, including North Falls and*	Please refer to response 1b of **8.30 Applicant's Response to Rule 17 Letter received 30 June 2026 [REP6-132] regarding inter-project cumulative effects.** Please refer to Part 1a below for a response regarding the Employment and Skills Plan. The Applicant has already committed, through section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision F]**, to join and engage with a Developer's Forum to be set up by ECC. In addition, the Applicant has included in section 6.6 of the same document a set of high-level principles relating to the Developer's Forum. The Applicant considers that the inclusion of this commitment within the Outline CTMP provides an appropriate and robust mechanism for securing engagement with the Developer's Forum. Compliance with the Outline CTMP will be secured through Requirement 4 in **3.1 Draft DCO [Revision G]** requiring the submission and approval of a final (detailed) CTMP substantially in accordance with the certified Outline CTMP. The Applicant is discussing with ECC the recovery of ECC's appropriate costs, such as the Developer's Forum costs, through a Planning Performance Agreement (PPA).

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		Five Estuaries Offshore Wind Farm and LTC, to ensure a coordinated approach to construction traffic management. Additionally, this liaison with the Main Works Contractor(s) should occur for significant local events within the area of the construction project, such as the Tendring Show. National Grid has committed to join and engage with a Developer's Forum to be set up by Essex County Council, subject to agreeing suitable terms of reference, to continue and formalise project coordination. National Grid envisages that when the build programmes are available from the Main Works Contractor(s) these will be brought to the Developer's Forum and discussed with the Final Construction Traffic Management Plan developed. National Grid will engage with other Forums set up and managed by other Local Highway Authorities, where appropriate. ECC is proposing this commitment be secured by way of a S106 Unilateral Undertaking but if this were not to happen, a commitment such as that above in the oCTMP which is a certified document, would be sufficiently robust to secure their involvement. However, there are ongoing discussions regarding the Applicants funding of the Developers Forum as set out in 4.4.29 – 4.4.32 of ECC's LIR [REP1 161].	
REP6-147	Essex County Council	**Employment and Skills Plan** Response to part a: ECC welcomes the inclusion of supply chain considerations within the outline Employment and Skills Plan (ESP) and recognises the Applicant's intention to maximise opportunities for local and regional businesses through early engagement, the use of established networks, and alignment with National Grid's procurement frameworks. The measures outlined, such as engagement via Chambers of Commerce, "Meet the Buyer" events, and encouraging contractors to consider local, SME and diverse suppliers—represent a positive foundation. However, ECC does not consider that the outline ESP has fully or adequately addressed the cumulative implications for supply chains arising from the number of Nationally Significant Infrastructure Projects (NSIPs) consented or progressing within the same geographic area. In particular, ECC would highlight the following: • Cumulative pressure on local supply chains: While the document recognises local engagement, it does not sufficiently assess or respond to the potential strain on local businesses, materials, and services resulting from concurrent major infrastructure projects in the region. • Coordination across projects: There is no clear mechanism for coordination with other NSIPs to manage overlapping demand for goods, services, and labour. This creates a risk of inflationary pressures, reduced availability of suppliers, and missed opportunities for strategic alignment across projects. • Support for local businesses: The current proposals focus primarily on advertising opportunities rather than actively enabling participation. There is limited detail on how local businesses—	The Outline Employment and Skills Plan (OESP) is an outline, non-statutory framework and is not intended to be an assessment of supply chain effects. Relevant socio-economic and labour effects are assessed separately in **6.15 ES Chapter Socio-Economics, Recreation and Tourism [Revision C].** Whilst there will be some temporal and spatial overlap between the Project and other NSIPs as linear infrastructure the character, scale and magnitude of this project are fundamentally different. Furthermore, as identified in **6.15 ES Chapter Socio-Economics, Recreation and Tourism** [**Revision C]** approximately 10% of the construction workforce is expected to be sourced locally, reflecting the specialist nature of much of the construction activity and reducing the potential for significant competition within local labour markets. General civils construction skills are likely to be the main overlap with other NSIPs and the Applicant is confident in supply chain capacity within the civils market. By way of background, National Grid has established the Great Grid Partnership (GGP) to support the delivery of the Project. Consisting of seven partners (consultancies and contractors) the GGP has enabled National Grid to procure and commit project scope to construction partners earlier than in traditional project delivery to ensure the necessary capacity can be retained, retrained and upskilled for its investment projects which include Norwich to Tilbury. Areas with known skill shortages are being proactively managed across the wider project portfolio to ensure that resources can be utilised efficiently and effectively. The Applicant therefore remains confident that sufficient capacity exists within the civils supply chain. The Applicant's approach as set out within the OESP is to work with existing regional coordination mechanisms such as the RSCF to plan and deliver rather than create new structures. Section 6.4 of **8.13 Outline Employment and Skills Plan [Revision B]** sets out the commitment to collaborate with such partners and other project promoters to co-ordinate workforce planning.

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		particularly SMEs—will be supported to navigate procurement processes, meet compliance requirements, and compete effectively. To address these concerns, ECC recommends that the Applicant strengthens the outline ESP through the following measures: • Enhanced business support: Provide targeted support to local businesses, including: • Guidance on procurement processes and requirements • Training on bidding for contracts • Support to meet compliance, standards, and accreditation requirements. • This should not only relate to this project but also enable businesses to access opportunities arising from other nearby infrastructure projects. • Strategic coordination: Commit to working collaboratively with other NSIP promoters and relevant stakeholders to: – Share supply chain intelligence – Coordinate procurement timing where feasible – Minimise cumulative adverse impacts on local businesses • Supply chain impact assessment: Include clearer analysis of cumulative demand across projects and how this will be managed or mitigated.	The Council's recommendations to strengthen the OESP through additional suggested measures such as the provision of enhanced business support and guidance on procurement and bidding have been included within the **8.13 Outline Employment and Skills Plan [Revision B]** submitted for Deadline 7. Additional commentary has also been provided which expands upon the benefits of strategic co-ordination.
REP6-147	Essex County Council	**Response to part b** ECC supports the inclusion of a requirement within the draft Development Consent Order to secure the Employment, Skills and Procurement Strategy. In response to the request from the ExA on the current drafting of the Requirement, ECC would comments as follows: • Formal approval requirement: The ESP should be subject to approval by the relevant local authorities prior to implementation. • Timing: Approval should be secured no later than six months prior to the commencement of development, to allow sufficient time for effective planning, coordination, and mobilisation of local supply chains and skills provision. To assist the ExA, ECC proposes the following wording: 5. Employment and Skills Plan (1) No stage of the authorised development may not commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted to and approved by the relevant county planning authority and Thurrock Council. (2) The authorised development must be carried out in accordance with the approved employment and skills plan submitted further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Thurrock Council. (3) The employment and skills plan must be submitted to the relevant county planning authority and Thurrock Council for approval no later than	The OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county councils, Thurrock Council, local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. Therefore, the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]**, such that the Final ESP, which is to be consistent in scope with the OESP, is to be submitted to and approved by the relevant host county authorities and Thurrock prior to the commencement of development.

Examination Library ID	Name	Matter	NG Response
		six months prior to the commencement of any of stage of the authorised development.	
REP6-147	Essex County Council	**Additional Comments on the draft Employment and Skills Plan published at Deadline 5 [REP5-215]** ECC would also wish to raise the following commentary on the submitted Employment and Skills Plan. Ongoing governance and monitoring: The requirement should ensure that: • The approved strategy includes clear delivery commitments • Monitoring and reporting mechanisms are secured • The strategy can be reviewed and updated periodically in agreement with the relevant local authorities Stakeholder-led delivery structure: Establish a dedicated supply chain, employment and skills steering group comprising: • Local authorities • Department for Work and Pensions • Further education providers • Greater Essex Careers Hub • Chambers of Commerce and business organisations This group should help shape delivery, ensure alignment with local economic conditions, and maximise benefits. This should either form a Requirement, or the ESP should contain a commitment from the Applicant to establish to the Applicants Monitoring and adaptability: Introduce a robust reporting and review framework, including: o Quarterly monitoring reports o Annual review and republication of the strategy This will ensure the ESP remains responsive to evolving labour market conditions and economic pressures. Separation from community benefits: The Council emphasises that employment, skills, and supply chain measures should be clearly distinguished from community benefits, ensuring that economic development commitments are properly defined, secured, and delivered. In summary, ECC is of the opinion that while the outline ESP provides a positive starting point, there are concerns regarding its current drafting and further strengthening is required to address cumulative supply chain pressures, improve support for local businesses, and ensure effective coordination with other infrastructure projects. Securing the ESP through a robust DCO requirement, with local authority approval and clear monitoring provisions, is therefore essential to ensuring the strategy delivers meaningful and measurable local benefits and a proper legacy for the project.	The Applicant notes that the **8.13 Outline Employment and Skills Plan [REP5-215]** already provides for the establishment of a stakeholder group including local authorities. The Applicant recognises the importance of broad stakeholder representation and will work with the host county and unitary authorities to establish an appropriate range and number of stakeholders. The composition and role of this group will be developed further through the Final ESP, including consideration of how it can support plan development, reflect local needs and priorities, and contribute to effective delivery. The **8.13 Outline Employment and Skills Plan [Revision B]** submitted at Deadline 7 has been amended to expand upon the role of the group and to commit the Final ESP to establishing the terms of engagement and committing to the monitoring, reporting and review of its implementation. The Applicant agrees with the Council that the Outline (and Final) Employment and Skills Plan is distinct from the community benefits as established and delivered through the Community Fund. The Applicant recognises that successful delivery of the Final ESP will require partnership working with the county and unitary authorities, as well as local and regional skills and education providers. As such it is important that the parties continue to collaborate as to the actions and management measures that will be proposed within the document are proportionate in scale. On this basis therefore the Applicant has amended Requirement 15 (**3.1 Draft DCO [Revision G]**) such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.
REP6-147	Essex County Council	Community Benefit Funding: ECC recognises the Community Benefit Fund is unrelated to the assessment of the DCO and welcomes the forthcoming opportunity to comment on the Applicants approach to the structure and operation of this fund. ECC does however believe there should be some linkage between Community Benefits and the DCO possibly through a S111 agreement to	The Applicant agrees with ECC that the Community Fund is unrelated to the assessment of the DCO and we are pleased that ECC welcomes the forthcoming opportunity to comment on National Grids approach to community funds (subject to receiving development consent). The Applicant re-iterates that there is a clear separation between the Community Fund and the DCO for the reasons we explained in **8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132].**

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		commit the funds to the communities affected by the Project. At present there is nothing to prevent the Applicant from withdrawing or reducing the funds available for community benefits given the status of the guidance upon which they are based. It is also disappointed that there is no spatial allocation of funds given the proportion of the project which traverses through Essex. Depending on the level of engagement by communities, there is a concern that a disproportionate amount could go to communities outside of Essex. ECC will be making these representations in respect to the Applicant's Community Benefit Fund consultation.	National Grid is committed to ensuring communities that are hosting infrastructure receive fair and tangible benefits for doing so. We are keen to continue working closely with ECC to ensure that the Fund reflects the needs of the communities hosting the infrastructure, in line with the requirements set out in the Government's guidance for transmission infrastructure Community Funds for Transmission Infrastructure: Guidance, which is clear that Community Funds should sit outside the planning and consenting regime. In particular, the guidance sets out that: • Community funds must remain separate from the DCO and planning decision-making • They are not mitigation and cannot be used to justify or secure consent • Community benefits are voluntary and policy-led, rather than legally required The Applicant does not agree that a dedicated Employment and Skills Fund via s111 is necessary or appropriate, or that there are any legal or consenting grounds to 'conjoin' the fund with the consented scheme. The Outline Employment and Skills Plan appropriately reflects the level of commitment required in line with paragraph 5.13.12 of NPS EN-1 (2024).
REP6-165	Suffolk County Council	**a) The ExA asks all local authorities for their comments on the outline ESP [REP5- 215], including whether they consider the applicant has adequately addressed the matter of supply chains within the document bearing in mind the number of other Nationally Significant Infrastructure Projects consented in the vicinity of the proposed development. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised.** 1.1 Suffolk County Council welcomes the Applicant's commitment within the Outline Employment and Skills Plan ("OESP") to engage with local authorities and relevant stakeholders in the preparation of a Final Employment and Skills Plan ("ESP"). SCC supports the principle of securing an ESP through the DCO and recognises the importance of early and ongoing engagement in developing an effective and deliverable workforce and skills strategy, particularly in a region experiencing significant demand from multiple overlapping NSIPs 1.2 However, SCC does not consider that the OESP, in its current form, provides a sufficiently robust, integrated or evidence-led framework to demonstrate that the workforce, skills and employment implications of the Project have been fully assessed or can be effectively managed. 1.3 However, SCC does not consider that the OESP, in its current form, provides a sufficiently robust, integrated or evidence-led framework to demonstrate that the workforce, skills and employment implications of the Project have been fully assessed or can be effectively managed. While the document provides a useful strategic framework, it does not provide sufficient clarity, structure or certainty regarding how engagement will be undertaken, how local authority input will influence outcomes, or how workforce planning, skills interventions and delivery mechanisms will be coordinated. The commitment to engagement is expressed at a high level and is not supported by a clearly defined	The Applicant welcomes Suffolk County Council's support for the principle of the OESP and the preparation of a Final ESP secured through the DCO. The Applicant does not agree that the **8.13 Outline Employment and Skills Plan (OESP) [Revision B]** lacks an appropriate framework for the consideration of workforce, employment and skills matters. The OESP is an outline, benefit-led document which has been prepared to establish the strategic framework, principles, governance arrangements and commitments that will guide the development of the Final ESP. It is not a mitigation measure required to address an identified adverse effect. Socio-economic effects are assessed separately in **6.15 ES Chapter Socio-Economics, Recreation and Tourism [Revision C].** The OESP has been prepared as an outline document, proportionate to the current stage of the Project and recognising that detailed workforce requirements, procurement packages and contractor arrangements will continue to evolve prior to construction. The purpose of the OESP is therefore to establish the framework, governance arrangements and commitments which will inform the preparation of the Final ESP. The Applicant notes Suffolk County Council's comments regarding governance, engagement and coordination. In response to consultation and examination discussions, the OESP has been updated at Deadline 7 to strengthen commitments relating to engagement with local authorities, employment and skills organisations, the Regional Skills Coordination Function (RSCF), and other major infrastructure project promoters. Sections 6 and 7 of the **8.13 OESP [Revision B]** set out the proposed approach to collaboration, preparation of the Final ESP, delivery arrangements and stakeholder engagement. The OESP establishes the governance framework and process through which monitoring, reporting and review arrangements will be developed as part of the Final ESP. The Applicant considers that the

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		governance framework, programme of engagement or mechanism for incorporating local authority input into workforce modelling, skills interventions or delivery planning. As such, it does not yet align with the level of coordination required to manage the scale, complexity and cumulative nature of workforce and skills demand associated with the Project and other major infrastructure schemes in the region. 1.4 In line with SCC's Energy and Climate Adaptive Infrastructure Policy and associated supplementary guidance, engagement must extend beyond consultation and form part of a structured and ongoing collaborative approach to workforce planning and skills delivery. This includes working through established mechanisms such as the Regional Skills Coordination Function ("RSCF"), which provides the strategic framework for aligning labour demand from major infrastructure projects with local skills provision, coordinating interventions and managing cumulative impacts across Suffolk and the wider region. Whilst the OESP references engagement with stakeholders, it does not commit to participation in this established governance structure with sufficient clarity or certainty. 1.5 Furthermore, the effectiveness of engagement is dependent on the availability of a robust and phase-specific evidence base. SCC remains concerned that the OESP does not include sufficient workforce data regarding role profiles, workforce numbers, skills requirements and durations. Without this information, stakeholders are unable to provide meaningful input into the scale or type of interventions required, and it is not possible to determine whether the proposed approach is proportionate, deliverable or sufficient to address identified skills gaps and labour market pressures. SCC 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 whether appropriate evidence-led mitigation can be identified and secured at the pre-consent stage, consistent with the expectations of NPS EN-1. 1.6 SCC also notes that key elements of the OESP, including specific interventions, workforce-related outputs and delivery arrangements, are largely deferred to the post-consent stage. While the OESP identifies potential mechanisms and future activities, it does not establish a clear linkage between forecast workforce demand and the scale or type of training, employment or business support required. The absence of committed targets, monitoring arrangements and performance measures further limits the ability to secure meaningful outcomes through the proposed DCO Requirement and raises concerns regarding precision, certainty and enforceability. 1.7 SCC also remains concerned that the OESP places greater emphasis on maximising opportunities than on identifying and managing potential adverse impacts. In SCC's view, the ESP should function not only as a mechanism for securing benefits, but also as a tool for identifying, assessing and mitigating adverse effects arising from labour demand, including labour displacement, wage inflation and cumulative labour market pressures. Labour demand generated by major infrastructure projects can give rise to both beneficial and adverse	Final ESP is the appropriate mechanism through which detailed targets and performance measures should be established, reflecting the workforce, informed by contractor inputs and the latest workforce and procurement information available prior to construction. The Applicant does not agree that supply chain matters, including cumulative pressures arising from other NSIPs, have not been adequately considered. The OESP recognises the cumulative context within which the Project will be delivered and includes commitments to work collaboratively with the RSCF, local authorities and other project promoters to support workforce planning, share supply chain intelligence and coordinate procurement activities where feasible. The OESP has been strengthened during the Examination to reinforce these commitments and to support the management of cumulative labour market and supply chain pressures. With regards to workforce planning, by way of background, National Grid has established the Great Grid Partnership (GGP), enabling early contractor appointment, workforce planning and resource management across the wider Accelerated Strategic Transmission Investment (ASTI) programme. The GGP comprises seven partners who will support the delivery of an initial nine ASTI projects. Construction partners were appointed in 2025, enabling early skills and resource planning, and workforce requirements for the Project continue to be reviewed and refined to ensure the appropriate capability is available to support project delivery. Known shortages in specialist transmission roles are actively managed across the wider portfolio to support the efficient deployment of skilled resources and minimise potential constraints arising from overlapping infrastructure projects. The Applicant notes that the predominant overlap with other major infrastructure projects is expected to be in relation to civils construction activities, where there is no identified shortage within the energy infrastructure sector. The Applicant remains confident that sufficient capacity exists within the civils supply chain. The Applicant also notes that, whilst the Project represents a significant infrastructure investment, its peak construction workforce is substantially lower than that associated with major projects such as Sizewell C. The scale of workforce demand should therefore be considered within the context of the wider regional infrastructure programme. Furthermore, **6.15 ES Chapter Socio-Economics, Recreation and Tourism [Revision C]** identifies that approximately 10% of the construction workforce is expected to be sourced locally, reflecting the specialist nature of much of the construction activity and reducing the potential for significant competition within local labour markets.

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		effects, particularly when considered cumulatively alongside other NSIPs. The ESP should therefore play a central role in managing those impacts through a coordinated and evidence-led approach. 1.8 Overall, while SCC supports the principle of the OESP and the preparation of a Final ESP, SCC considers that the current document does not yet provide sufficient detail, certainty, governance or evidence to demonstrate that workforce, skills and employment impacts have been fully understood or will be effectively managed. SCC therefore considers that the OESP should be strengthened through a clearer governance framework, a defined role for the RSCF, a more robust workforce evidence base, and a clearer demonstration of how engagement will inform the delivery and monitoring of interventions. 1.9 SCC recognises that the OESP acknowledges the importance of supply chains and identifies a range of high-level activities intended to support local and regional businesses in accessing opportunities associated with the Project. SCC also notes the Applicant's reference to engagement with Chambers of Commerce, supplier networks and "Meet the Buyer" events, which are recognised mechanisms for promoting supply chain participation. 1.10 However, SCC does not consider that the OESP adequately addresses the matter of supply chains, particularly in the context of the scale, complexity and cumulative nature of demand arising from multiple NSIPs across Norfolk, Suffolk and Essex. The OESP adopts a largely generic approach to supply chain engagement and does not provide the level of detail, evidence or strategic coordination required to understand or manage supply chain impacts in a meaningful way. 1.11 In line with SCC's Energy and Climate Adaptive Infrastructure Policy and associated supplementary guidance, a robust assessment of supply chain effects should be based on a clear understanding of the goods and services required by the Project, the capacity and capability of businesses within defined geographic areas, and the likelihood of those businesses being able to respond to demand across di erent phases of construction. The OESP does not provide a sufficiently detailed, phase-specific assessment of supply chain requirements, nor does it establish a scenario-based approach to understanding the probability of local and regional supply chain participation. Consequently, it is not possible to determine the scale of opportunity available to local businesses, the extent of reliance on external suppliers, or the potential impact on existing business capacity. 1.12 This is particularly important in the context of cumulative demand. The OESP acknowledges that a number of other NSIPs and major developments are progressing within the Study Area and are likely to require similar construction, engineering, logistics and specialist technical services. However, it does not provide a substantive assessment of how these overlapping demands may affect the availability, capacity or resilience of local and regional supply chains. Nor does it consider the potential for adverse effects such as market saturation, cost inflation, displacement of existing businesses or constraints on project delivery arising from competition for resources. As a result, SCC does not consider that cumulative supply chain effects have been adequately assessed.	

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		1.13 SCC is also concerned that the OESP does not establish how the Applicant intends to coordinate with other project promoters, local authorities, the RSCF or wider regional partners to manage these cumulative pressures. In the absence of such coordination, there is a risk that supply chain opportunities will not be optimised and that local businesses may either be unable to participate due to capacity constraints or adversely affected by competing demand. This is inconsistent with SCC's policy expectation that project promoters work collaboratively to minimise adverse impacts and maximise long-term economic benefits. 1.14 As with the workforce and skills elements of the OESP, the definition of specific supply chain interventions and outcomes is largely deferred to the post-consent stage. While the OESP identifies a number of potential activities, it does not establish a clear linkage between forecast supply chain demand and the scale or type of support required to enable local businesses to participate. Nor does it include clearly defined targets, monitoring arrangements or performance measures relating to local or regional supply chain participation. This limits the ability to assess whether the proposed approach is proportionate, deliverable or capable of being effectively secured through the DCO. 1.15 SCC further considers that the OESP does not sufficiently recognise the relationship between workforce planning, skills provision and supply chain capacity. Workforce demand, skills provision and supply chain participation should be considered as components of an integrated system rather than separate topics. The ability of local businesses to participate in supply chain opportunities is directly dependent upon access to a suitably skilled workforce, while the success of training and employment interventions depends upon a clear understanding of future supply chain requirements. The OESP does not demonstrate how these relationships have informed the proposed approach, nor how workforce planning, skills development and supply chain participation will be coordinated to support delivery of the Project. The absence of such an integrated approach reduces confidence that either workforce or supply chain outcomes can be delivered effectively. 1.16 SCC does not consider that the OESP currently provides a sufficient evidence base, level of detail or framework for coordination to demonstrate that supply chain impacts, particularly cumulative impacts arising from multiple NSIPs, are adequately understood or managed. SCC therefore considers that the Final ESP should: i. provide a detailed, phase-specific assessment of supply chain requirements, including the principal goods and services required and their duration; ii. assess the capacity and capability of hyper-local, local and regional supply chains using a scenario-based approach; iii. include a quantified assessment of cumulative supply chain demand arising from other NSIPs and major developments, together with associated risks and constraints; iv. commit to coordinated working with local authorities, the RSCF and other project promoters to manage cumulative pressures and maximise opportunities;	

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		v. establish clear targets, monitoring arrangements and performance measures for local and regional supply chain participation capable of being secured through the DCO; and vi. demonstrate how workforce planning, skills provision and supply chain development will be coordinated as part of a coherent and integrated delivery framework. 1.17 These enhancements are necessary to ensure that the OESP and subsequent Final ESP function as credible, evidence-led and effective mechanisms for supporting sustainable economic growth, managing cumulative effects and delivering long-term workforce, skills and supply chain benefits across the region. 1.18 These enhancements are necessary to ensure that the OESP and subsequent Final ESP function as credible, evidence-led and effective mechanisms for supporting sustainable economic growth, managing cumulative effects and delivering long-term workforce, skills and supply chain benefits across the region.	
REP6-165	Suffolk County Council	**b) Views are sought from the applicant, as well as all local authorities, as to whether approval of the submitted document should be secured within the wording of the new requirement (requirement 15) in schedule 3 of the draft DCO [REP5-060] relating to the ESP.** 1.19 SCC welcomes the inclusion of Requirement 15 within Schedule 3 of the draft Development Consent Order ("DCO"), which provides a mechanism for securing an Employment and Skills Plan ("ESP"). SCC agrees that the principle of requiring a Final ESP prior to commencement is appropriate. However, SCC considers that the current drafting does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the socio-economic impacts of the Project and delivering meaningful skills, employment and supply chain outcomes. 1.20 SCC considers that approval of the Final ESP by the relevant local authorities should be secured within the wording of Requirement 15 and that submission of the document alone would not provide a sufficient level of certainty or control. 1.21 As currently drafted, Requirement 15 requires submission of the ESP prior to commencement but does not require the document to be approved before works begin. This creates a risk that the ESP may not be adequately scrutinised or agreed and that deficiencies in its evidence base, scope or delivery mechanisms cannot be resolved prior to implementation. In SCC's view, this significantly weakens the effectiveness of the Requirement as a control. Approval is necessary to ensure that the ESP is consistent with the Outline ESP, incorporates sufficient detail on workforce demand, skills interventions and supply chain measures, and aligns with local and regional governance arrangements, including the Regional Skills Coordination Function ("RSCF"). 1.22 SCC also has concerns regarding the use of the terms "substantially in accordance with" and "general accordance" within the drafting of the Requirement. These introduce a degree of flexibility which, in the antabsence of sufficient detail within the Outline ESP, creates	The Applicant welcomes Suffolk County Council's support for the principle of Requirement 15 and the preparation of a Final ESP prior to commencement of construction. In response to 1.19 and 1.21 the **8.13 Outline Employment and Skills Plan (OESP) [Revision B]** is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county and unitary authorities, as well as local and regional skills and education providers. As such it is important that the parties continue to collaborate as to the actions and management measures that will be proposed within the document are proportionate in scale. On this basis therefore the Applicant has amended Requirement 15 (see **3.1 Draft DCO [Revision G]**) such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development. With regards to 1.22 the Applicant does not agree that the term "substantially in accordance with" creates uncertainty over delivering the scope set out. In response to 1.23 the **8.13 Outline Employment and Skills Plan [Revision B]** has been updated at Deadline 7 to make explicit reference to the need for the Final ESP to include for monitoring, reporting and review in the context of the proposed steering group.

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		uncertainty as to how compliance will be assessed and what level of deviation from the outline document would be acceptable. Given SCC's existing concerns about the limited level of detail in the Outline ESP, reliance on such broadly framed wording risks allowing further dilution or alteration of commitments at the post-consent stage without any clear mechanism for ensuring equivalence or adequacy. This reduces the degree of certainty that the Requirement can provide. 1.23 These concerns are amplified by the substantive issues SCC has identified throughout the Examination regarding the Outline ESP. In particular, SCC remains concerned that there is no clear linkage between forecast workforce and supply chain demand and the interventions required to address it; that key elements, including interventions and outputs, are deferred to the post-consent stage; and that there are no defined targets, monitoring arrangements or performance measures. In this context, the effectiveness of Requirement 15 is critical. However, as currently drafted, the Requirement does not provide sufficient assurance that these matters will be addressed within the Final ESP, nor that the resulting document will be proportionate, deliverable and evidence-led. This, in turn, raises concerns as to whether the Requirement is sufficiently precise and enforceable, particularly given that the ESP is intended to play a key role in managing socio-economic impacts. 1.24 SCC considers that Requirement 15 should be amended to require the ESP to be approved in writing by the relevant local authorities prior to commencement. Approval should be contingent upon the authority being satisfied that the ESP is supported by a robust, phase-specific assessment of workforce and supply chain demand; includes clearly defined interventions aligned to that demand; establishes appropriate governance arrangements, including engagement through the RSCF; and contains clear targets, monitoring and reporting mechanisms. SCC also considers that the wording relating to compliance with the approved ESP should be strengthened and that provision should be made for the review and updating of the ESP, subject to local authority approval, where necessary to respond to changing labour market conditions or cumulative impacts.	
REP6-137	Basildon Borough Council	15. Employment and Skills Plan (1) No stage of the authorised development may not commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted to and approved for approval to by the relevant county planning authority and Basildon Borough Council. (2) The authorised development must be carried out in general accordance with the approved any employment and skills plan submitted further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Basildon Borough Council. (3) The employment and skills plan must be submitted to the relevant county planning authority and Basildon Borough Council for approval no later than six months prior to the commencement of any of stage of the authorised development.	The OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county councils, Thurrock Council, local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. On this basis the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]** such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.

Examination Library ID	Name	Matter	NG Response
REP6-139	Braintree District Council	In respect of part (a) [of the Rule 17 letter], the Council defers to Essex County Council (ECC), which is leading on employment, skills and supply chain matters on behalf of the Essex authorities. The Council has engaged with ECC throughout the examination on these matters and supports ECC taking the lead in responding to the ExA's questions. In respect of part (b) [of the Rule 17 letter], the Council also defers to ECC's detailed response. However, the Council considers that any Employment and Skills Plan secured through the DCO should be subject to approval by the relevant County Council or Unitary Authority, as the authority with responsibility for strategic skills and employment functions.	The Applicant notes that Braintree District Council supports the response provided by Essex County Council **[REP6-147]**. The Applicant's response to these representations is therefore set out in its response within this document to **REP6-147**. With respect to part 2(b), the OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county councils, Thurrock Council, local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. On this basis the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]** such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.
REP6-140	Brentwood Borough Council	In respect of part (a) [of the Rule 17 letter], Brentwood Borough Council (BBC) defers to Essex County Council (ECC), which has been leading on employment, skills and supply chain matters on behalf of the Essex authorities. BBC has engaged with ECC throughout the examination on this matter and supports ECC taking the lead in responding to the ExA's questions. In respect of part (b) [of the Rule 17 letter], BBC also defers to ECC's detailed response, which it has reviewed and concurs with, including its support for the position that any Employment and Skills Plan secured through the DCO should be subject to approval by the relevant County Council or Unitary Authority, as the authority with responsibility for strategic skills and employment functions.	The Applicant notes that Brentwood Borough Council supports the response provided by Essex County Council **[REP6-147]**. The Applicant's response to these representations is therefore set out in its response within this document to REP6-147. With respect to part 2(b), the OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county councils, Thurrock Council, local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. On this basis the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]** such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.
REP6-144	Chelmsford City Council	In respect of part (a) [of the Rule 17 letter], the Council defers to Essex County Council (ECC), which is leading on employment, skills and supply chain matters on behalf of the Essex authorities. The Council has engaged with ECC throughout the examination on these matters and supports ECC taking the lead in responding to the ExA's questions. In respect of part (b), the Council also defers to ECC's detailed response. However, the Council considers that any Employment and Skills Plan secured through the DCO should be subject to approval by the relevant County Council or Unitary Authority, as the authority with responsibility for strategic skills and employment functions. As part of this we will be suggesting revised wording for Requirement 15 possibly along the lines as outlined below to reflect our request that the Plan needs to be subject	The Applicant notes that Chelmsford City Council supports the response provided by Essex County Council **[REP6-147]** with regard to part 2(a) **[PD-029]**. The Applicant's response to these representations is set out in its response to **REP6-147**. With respect to part 2(b), the OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms.

Examination Library ID	Name	Matter	NG Response
		to approval. 15. Employment and Skills Plan (1) The authorised development may not commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted for approval to the relevant county planning authority and Thurrock Council. (2) The authorised development must be carried out in general accordance with the approved any employment and skills plan submitted further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Thurrock Council no later than six months prior to the commencement of development	Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county and unitary authorities, as well as local and regional skills and education providers. As such it is important that the parties continue to collaborate as to the actions and management measures that will be proposed within the document are proportionate in scale. On this basis the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]** such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.
REP6-156	Norfolk County Council	NCC are content with the outline employment and skills plan proposed. The plan should be secured by requirement and as part of NCC's LIR submission we provided proposed draft requirement wording.	The Applicant welcomes Norfolk County Council's confirmation that it is content with **8.13 OESP [REP5-215]**. The final **8.13 OESP [Revision B]** is secured by Requirement 15 of **3.1 Draft DCO [Revision G]**.
REP6-145	Colchester City Council	**a) The ExA asks all local authorities for their comments on the outline ESP [REP5 215], including whether they consider the applicant has adequately addressed the matter of supply chains within the document bearing in mind the number of other Nationally Significant Infrastructure Projects consented in the vicinity of the proposed development. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised.** In response, ECC have drafted a response to the ESP and CCC support that. *[The IP provides a copy of the response provided by ECC]*	The Applicant notes that Colchester City Council supports the response provided by Essex County Council **[REP6-147]**. The Applicant's response to these representations is set out in this document, in its response to REP6-147 above.
REP6-145	Colchester City Council	**b) Views are sought from the applicant, as well as all local authorities, as to whether approval of the submitted document should be secured within the wording of the new requirement (requirement 15) in schedule 3 of the draft DCO [REP5 060] relating to the ESP** Yes, it should, and CCC suggest the following wording: 15. Employment and Skills Plan (1) No stage of the authorised development may commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted to and approved by the relevant county planning authority and Thurrock Council. (2) The authorised development must be carried out in accordance with the approved employment and skills plan submitted further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Thurrock Council. (3) The employment and skills plan must be submitted to the relevant county planning authority and Thurrock Council for approval no later than six months prior to the commencement of any of stage of the authorised development.	The OESP is a benefit-led document rather than a mitigation measure required to address an identified adverse effect. Unlike management plans such as the CoCP it is not required in order to make the development acceptable in planning terms. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county councils, Thurrock Council, local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. On this basis the Applicant has amended Requirement 15 of **3.1 Draft DCO [Revision G]** such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.

Appendix A. Response to comments on ExQ2 [REP6-170]

nationalgrid

Appendix A
Applicant's Response to Thurrock Council comments on ExQs2 [REP6-170]

Table A.1 Applicant's Response to Thurrock Council comments on ExQ2 [REP6-170]

Reference / Question	Applicant's Response	IP Comment on Applicant Response	Applicant Response
GEN 2.4 Report on interrelationship with other infrastructure projects The ExA notes that the latest cut-off date for other existing and approved developments in the cumulative assessment is currently 31 January 2026 (**Environmental Statement (ES) Chapter 17 - Cumulative Effects - Response Update [REP4-163]**, see also question GEN 2.5 below). However, the final version of the interrelationship report **[REP4-296]** should include, as far as possible, the most up-to-date position relating to the progress of other approved and pending development proposals in a summary 'at a glance' document. The applicant is asked to: • ensure its final interrelationship report to be submitted at deadline 7 is consistent with ES chapter 17 and [REP4-163] • include an indication of the location of Tasway Energy Park (DCO 17) in table 2.1 of the next version of the report (the ExA notes that this proposal is not included in the plans due to the infancy of its design development) and, if available, an indication of its submission date to the Planning Inspectorate. All local authorities, and IPs who are listed in the interrelationship report, are asked to: • Review the interrelationship report [REP4-296] and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish.	The Applicant will ensure that the final **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** to be submitted at Deadline 7 will be consistent with any submission containing the assessment of inter-project cumulative effects. The Applicant can also confirm: • The initial version of the report provided at Deadline 1, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, was consistent with, i.e. took into account, the other projects in the Environmental Statement (ES) Chapter 17 short list provided in **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**. • The mid-examination update of the report provided at Deadline 4, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**, was consistent with, i.e. took into account, additional projects added to the ES Chapter 17 short list in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** both took into account planning applications submitted up to 31 January 2026. The Applicant also took account of updates to Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**, e.g. amended construction dates, in the assessment provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**.	2.1 GEN 2.4 – Report on interrelationship with other infrastructure projects The Examining Authority notes that the latest cut-off date used within the cumulative assessment is currently 31 January 2026 and referred to the Environmental Statement Chapter 17 – Cumulative Effects Response Update [REP4-163] and the Interrelationship Report [REP4-296]. The Examining Authority has requested local authorities and other interested parties to review the updated Interrelationship Report [REP-296] and confirm whether, to the best of their knowledge, the position relating to approved and proposed developments is accurate. The Examining Authority has also invited any further comments on the report where necessary. ID 2.1.1 The Council has reviewed the updated Interrelationship Report [REP4-296] and have the following amendments to make: **ID** / **Application Reference** / **Amendment** TH33/TH37 — 23/01321/SCO / 23/01501/FUL — Correct application reference is: 24/01501/OUT – approved by planning committee on 10.02.2026 TH58 — 25/00969/SCR — New application reference is 26/00413/OUT – planning application has been submitted after advice provided TH59 — 25/00845/OUT — Decision pending – going to Planning Committee on 06.07.2026 2.1.2 The Council requests the following new application to be added: **Application Reference** / **Proposal Description** / **Status** 26/00413/OUT — Outline planning application (with all matters reserved except for access) for up to 385 residential dwellings (Use Class C3), provision of public open space, and associated infrastructure. — Pending	The Applicant notes the updates from Thurrock Council. The Application Reference 26/00413/OUT will be included within the updated **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** and the Long List of Other Developments within the Cumulative Effects Assessment (**6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision B]**) that will be published at Deadline 7.

Reference / Question	Applicant's Response	IP Comment on Applicant Response	Applicant Response
	• The final update of the report to be provided at Deadline 7, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, will be consistent with, i.e. will take into account, any additional projects added to the ES Chapter 17 short list as submitted to the examination at Deadline 7. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** will take into account planning applications submitted up to the same date (see response to GEN 2.5). The Applicant will also take account of updates to Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, e.g. amended construction dates, in the assessment provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]**. The Applicant will provide an indication of the location of Tasway Energy Park (DCO 17) in Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** to be submitted at Deadline 7, as requested. According to the maps in this project's Phase 1 Consultation (21 October to 5 December 2025) brochure available on the promoter's website, the communities that would surround the project include Ashwellthorpe, Tasburgh, Long Stratton, Wacton, Forncett Saint Peter, Forncett End, Tacolneston and Bunwell in South Norfolk. The Applicant notes that, as of late May 2026, there is no page for Tasway Energy Park on the Planning Inspectorate's National Infrastructure portal; such a page would indicate the planned date for the submission of the application for development consent. The Tasway Energy Park Phase 1 Consultation (21 October to 5 December 2025) brochure stated that the application for development consent had then been proposed in early 2027; however, as this brochure pre-dated the promoter's December 2025 announcement that there		

Reference / Question	Applicant's Response	IP Comment on Applicant Response	Applicant Response
	will be a delay to the planning process until this project has better visibility of their grid connection point, the Applicant considers the date in the brochure is no longer current. As the developer's website does not carry an updated application date, the Applicant is currently unaware of the current programme for this project. The Applicant will monitor this website and the Planning Inspectorate's National Infrastructure portal in its preparation of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, and provide the Examining Authority with an update at Deadline 7 if publicly available at that point.		
DES 2.5 Approach to scenarios The ExA notes the updates to the progress of a number of alternative design scenarios as noted in [REP4-310], and that a number of revised plans and documents are expected to be submitted at deadline 5, however it remains unclear when a number of the other alternative scenarios are likely to be confirmed for a number of reasons, including the progress of third party planning applications. The applicant is asked to ensure that by deadline 7 those outstanding alternative scenarios which remain are fully reasoned and timescales given wherever possible for such matters to be resolved. The local authorities are asked to review the Approach to Scenarios document [REP4-310], clarify their understanding of the scenarios which are reliant on third party planning applications, and to make other comments on the document where relevant to their area	The Applicant continues to engage with relevant stakeholders to reach an agreed position on the outstanding alternative scenarios set out in 8.11 Approach to Scenarios [Revision C] and intends to provide the requested information by Deadline 7. The Applicant has submitted an updated version of 8.11 Approach to Scenarios [Revision C] which summarises the latest position at Deadline 5.	The Examining Authority notes the updates provided by the Applicant regarding a number of alternative design scenarios within the Approach to Scenarios document [REP4-310]. However, it remains unclear when a number of the alternative scenarios will be confirmed, including those dependent upon third-party planning applications and other external factors. The Examining Authority has requested local authorities to review the Approach to Scenarios document [REP4-310], clarify their understanding of those scenarios reliant upon third-party planning applications and provide any further comments relevant to their administrative areas. The Council has reviewed the Approach to Scenarios document [REP4-310]. The Council is satisfied with the updates to the design scenarios the Applicant has provided. However, the Council would welcome continued engagement from the Applicant on the scenarios within Section H - Thurrock that are yet to be determined especially those where the Applicant has chosen to "retain flexibility".	Noted. The current status of the design scenarios within Section H are set out in **8.11 Approach to Scenarios [Revision E]** submitted at Deadline 7. In summary, the Applicant is now proceeding with Option A for design scenario 17 (Temporary Construction Compounds – Section G/H). Certain amended plans and documents reflecting this decision, including **8.15.7 Class of Rights Plans – Section H – Scenario 17 (Table 2.17) [Revision A]**, have been submitted at Deadline 7 and other remaining plans will be submitted at Deadline 8. The Applicant has also confirmed that it does need to preserve the flexibility represented in design scenario 15 (Tilbury North Access at the proposed new Tilbury North – Section H) due to yet unresolved programme interfaces with third party developments and to ensure the coordination of concurrent works. The Applicant will continue to engage with relevant stakeholders, including Thurrock Council, in relation to the design scenarios.

Appendix B. Additional Detailed Design Requests

nationalgrid

Appendix B
Additional Detailed Design Requests

B.1 Purpose of this table

B.1.1 This table is provided as part of the evidence of landowner engagement undertaken by the Applicant and its responsiveness to the feedback received from landowners on site-specific design matters. Updates from the last version are shown in red.

B.1.2 Through ongoing engagement with landowners and other interested parties, a number of potential design refinements have been identified for further consideration as part of the Project's detailed design development. In the event that the DCO is granted for the Project then these potential refinements are designed to fall within the parameters proposed to be authorised by the DCO, including the Limits of Deviation and/or the Order Limits, and remain within the scope of the environmental assessment reported in the Environmental Statement.

B.1.3 These potential refinements have been identified at an early stage because they reflect a preferred direction of change expressed by a landowner or other interested party during consultation and engagement. However, it is important to be clear as to their status. They do not represent commitments by the Applicant and remain subject to the detailed design process. In particular, any such refinement:

- remains subject to the outcome of further information gathering, surveys, ground-truthing and technical assessments;
- must comply with the development management and approval mechanisms contained within the draft DCO, including the relevant Requirements and certified documents;
- remains subject to the consideration of other stakeholder interests, engineering, environmental, operational, safety, land and programme requirements, together with the need to secure an appropriate overall design solution; and
- remains subject to all statutory duties and other legal obligations applicable to the Applicant.

B.1.4 For the avoidance of doubt, the Secretary of State may also impose additional requirements or constraints through any development consent ultimately granted.

B.1.5 The Applicant considers that the identification of these potential design refinements demonstrates a constructive approach to stakeholder engagement and a willingness to consider opportunities to accommodate local preferences where permitted and where reasonably practicable. The potential design refinements support the Applicant's submission that it has engaged with affected persons and landowners and will continue to do so through the ongoing process. However, for the purposes of determining the application, no matter how well intended by the Applicant, they should not be treated as embedded mitigation, proposed mitigation or secured mitigation within the mitigation hierarchy. Nor should they be relied upon as measures that are committed to be delivered through the DCO for the purposes of the planning balance. The planning merits of the application should be assessed on the basis of the Proposed Development and the mitigation secured through the application documents.

Table B.1 Additional Detailed Design Requests

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 1	Consultation Feedback	Alignment	RG14	Restrict as far as practicable south-westerly movement to not encroach into existing solar farm boundary.
ADDR - 2	Consultation Feedback	Haul road	RG15-RG16	Seek to agree position of haul road via voluntary agreements at the time of construction.
ADDR - 3	Consultation Feedback	Alignment	RG18	Restrict as far as practicable southerly movement of pylon and consider offset working area to minimise encroachment onto the proposed solar proposal.
ADDR - 4	Consultation Feedback	Vegetation	RG28	In proximity to Elm Farm, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 5	Consultation Feedback	Vegetation	RG38	In proximity to Northfield Road, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 6	Consultation Feedback	Alignment	RG43-RG44	Restrict south and north movements as far as practicable to maintain benefit of screening by woodland.
ADDR - 7	Consultation Feedback	Alignment	RG45	Restrict southern movement as far as practicable to maintain benefit of screening by treelined road to retain RG45 to east of road with restriction of movement to the north and east of RG46 to avoid knock on positional changes.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 8	Consultation Feedback	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 9	Consultation Feedback	Alignment	RG74	Restrict movement to the northeast as far as practicable to avoid pylon in ecological sensitive site.
ADDR - 10	Consultation Feedback	Alignment, access, working space	RG86-RG88	The detailed design of RG86-RG88 will take into account the river restoration works and any potential change in river alignment associated with the Waveney and Little Ouse Recovery (WaLOR) project and will avoid impacts on areas of high ecological value resulting from the WaLOR project where practicable.
ADDR - 11	Consultation Feedback	Vegetation, Traffic management	RG106-RG107	In proximity to Furze Way, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 12	Consultation Feedback	Permanent access route	RG106-RG109	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 13	Consultation Feedback	Construction Laydown Area	RG124-RG125	Seek to agree laydown area location with landowners to minimise impact
ADDR - 14	Consultation Feedback	Permanent access route	RG127-RG130	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 15	Consultation Feedback	Permanent access route	RG134-RG136	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 16	Consultation Feedback	Vegetation	RG144	In proximity to Palgrave Farm, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 17	Consultation Feedback	Alignment	RG144-RG145	Following detailed design, seek to ensure the alignment crosses the driveway mid-span unless following detailed design it is determined to not be practicable.
ADDR - 18	Consultation Feedback	Vegetation	RG148	In proximity to Owls Farm, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 19	Consultation Feedback	Alignment	RG151	Restrict north and south movements of pylon to reduce agricultural impacts, unless following detailed design it is determined to not be practicable.
ADDR - 20	Consultation Feedback	Hedgerow	RG163	As far as practicable avoid removal of hedgerow to the west of RG163.
ADDR - 21	Consultation Feedback	Historic environment	UKPN EEPK12	The applicant is aware of particular sensitivity of works around existing UKPN pylon EEPK12, close liaison necessary with landowner to ensure no impact to the sensitive location.
ADDR - 22	Consultation Feedback	Alignment	UKPN EEPK14 / RG77	UKPN to keep EEPK14 as close to the previous pylon as far as practicable.
ADDR - 23	Consultation Feedback	CSE platform	PI35	Ensure following detailed design the position CSE platform is located as close to the concrete pad as possible unless following detailed design it is determined to not be practical.
ADDR - 24	Consultation Feedback	Permanent access route	RG194	Permanent access to OHL pylon location to be agreed via voluntarily agreements at the time of operational survey and maintenance access required, subject there being a suitable point of access into the field.
ADDR - 25	Consultation Feedback	Alignment, Haul road	RG195	Restrict easterly movement as far as practicable to remain to the west of Offton Road.
ADDR - 26	Consultation Feedback	Permanent access route	RG196-RG200	Seek to agree permanent access to OHL pylon locations to via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 27	Consultation Feedback	Alignment	JC1-JC7	As far as practical keep OHL north to avoid areas of ancient woodland and increase distance from residential properties and village to the south.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 28	Consultation Feedback	Alignment	JC16	Restrict northern movement as far as practicable to maintain benefit of screening by treeline.
ADDR - 29	Consultation Feedback	Alignment	JC18	Restrict southerly movement as far as practicable to remain to the north of Washbrook Street.
ADDR - 30	Consultation Feedback	Permanent access route	JC27-JC35	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 31	Consultation Feedback	Hedgerow	JC Cable Chainage 5000-5100	As far as practicable avoid damage to the boundary feature / hedge to the east of the cable construction swathe.
ADDR - 32	Consultation Feedback	Trees	JC Cable Chainage 13100-13200	In proximity to Hunters Chase, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 33	Consultation Feedback	Construction in proximity to property	Holton St Marys - Lark Hall	Seek to maximise the distance between construction and the property and be sensitive in construction and timeframe impacting property.
ADDR - 34	Consultation Feedback	Trees	JC Cable Chainage 16456-16500 (TB3-TB4)	In proximity to Bounds Farm, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 35	Consultation Feedback	Trees	TB10-TB11	In proximity to Foxash Estate, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 36	Consultation Feedback	Trees	TB15-TB16	In proximity to Fountain Farm, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 37	Consultation Feedback	Haul road	TB18-TB19	Construction contractor to liaise with landowner regarding presence of livestock in the field and the appropriate management.
ADDR - 38	Consultation Feedback	Historic environment	TB21	Commitment not to damage Grade II listed milestone TB21
ADDR - 39	Consultation Feedback	Alignment	TB28-TB29	Restrict southern movement of OHL and avoid works in garden where practicable.
ADDR - 40	Consultation Feedback	Haul road	TB30	Liaise with landowner during detailed design and construction to minimise impact where practicable and informed by outcome of final pylon siting
ADDR - 41	Consultation Feedback	Alignment	TB46-TB47	Liaise with owner of adjacent reservoir during detailed design and construction to avoid impact to reservoir, keep works to south where practicable.
ADDR - 42	Consultation Feedback	Haul road	TB49-TB50	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 43	Consultation Feedback	Alignment	TB67-TB68	Avoid or reduce works within residential gardens as far as practicable for the UKPN low voltage works west of TB67-TB68.
ADDR - 44	Consultation Feedback	Alignment	TB69	Move TB69 beyond east or west as far as practicable to maintain benefit of screening by trees
ADDR - 45	Consultation Feedback	Compound area	TB69	Compound location to be discussed with landowners to minimise impact
ADDR - 46	Consultation Feedback	Storage area	TB72	Seek to utilise the land within the OHL LoD alignment for the stone storage area to enable release of the area to the west of the proposed OHL back to landowner for continued agricultural use
ADDR - 47	Consultation Feedback	Haul road	TB75-TB76	Aspiration for landowner to retain bellmouth and / or sections of the haul road. Subject to landowner gaining relevant permissions prior to NG/GGP commencing the reinstatement works.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 48	Consultation Feedback	Permanent access route	TB93-TB94	Seek to not use the permanent access between TB93 and TB94
ADDR - 49	Consultation Feedback	Alignment	TB94	Entry superseded by ADDR - 81
ADDR - 50	Consultation Feedback	Alignment	TB98	Avoid positioning pylon TB98 and its working area in the horse paddocks to the east where practicable
ADDR - 51	Consultation Feedback	Alignment	TB99	Avoid movement of TB99 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 52	Consultation Feedback	Alignment	TB103	Restrict movement to maintain the avoidance of oversail of the football goals as far as practicable
ADDR - 53	Consultation Feedback	Ecology	TB121-TB122	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 54	Consultation Feedback	Alignment	TB124	Avoid movement of TB124 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 55	Consultation Feedback	Permanent access route	TB137	Seek to agree permanent access to OHL pylon locations via voluntary agreements at the time of operational survey and maintenance access required.
ADDR - 56	Consultation Feedback	Haul road	TB159-TB160	Aspiration to restrict haul road route through Scout Jamboree site if the festival has not moved to a new location in 2028.
ADDR - 57	Consultation Feedback	Construction works scheduling, haul road	TB159-TB161	Work with the landowner and the Scouts to minimise any impact to the 2028 Scout Jamboree.
ADDR - 58	Consultation Feedback	Alignment, traffic management	TB165-TB166	Seek to agree road closure of Newney Green for OHL stringing works
ADDR - 59	Consultation Feedback	Trees	TB168-TB171	In proximity to Ongar Road, ensure, as far as practicable, **Outline Code of Construction Practice** Commitment Reference B08 **[REP2-014]** is adhered to.
ADDR - 60	Consultation Feedback	Haul Road, hedgerow	TB181-TB184	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 61	Consultation Feedback	Historic environment	TB183	Commitment not to damage Grade II listed milestone
ADDR - 62	Consultation Feedback	Permanent access route	TB192	Seek to agree permanent access to OHL pylon location via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 63	Consultation Feedback	Haul road	TB192-TB193	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 64	Consultation Feedback	Alignment	TB203 & TB204	Avoid movement to minimise encroachment onto the solar proposal unless following detailed design it is determined to not be practicable
ADDR - 65	Consultation Feedback	Ecology	TB204	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 66	Consultation Feedback	Construction works	TB243-TB245	Liaise with owner adjacent to works during detailed design and construction to minimise impact on effluent spreading activities where practicable and ensure appropriate funding mechanism in place for rapid cash-flow neutral response where off-site mitigation is required.
ADDR - 67	Consultation Feedback	Alignment, Construction works	TB257-TB258	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 68	Consultation Feedback	Alignment	TB258	Restrict movement to the south to minimise encroachment onto the aggregates facility unless following detailed design it is determined to not be practicable
ADDR - 69	Consultation Feedback	Alignment	TB259-TB260	Restrict movement to the west and favourin the maintain minimum separation from the high-pressure gas pipeline as far as practicable
ADDR - 70	Consultation Feedback	Alignment	YYJ and ZB overhead lines	The applicant has taken the decision to progress Scenario B for Design Scenario 18, as stated in the letter to the Examining Authority dated 9th February 2026 [**AS-084]**, and will continue to liaise with the developer accordingly during detailed design and shall seek to avoid impact on their programme of construction.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 71	Consultation Feedback	Permanent access route	YYJ119	Permanent access to OHL pylon locations to be agreed via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 72	Examination Submission **[REP2-028]**	Haul road	Farm in Wenham	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations, as per **Outline Code of Construction Practice** Commitment Reference AS03 **[REP2-014]**.
ADDR - 73	Examination Submission **[REP2-028, REP1-456]**	Construction works	JC Cable Chainage 4100	Construction would not need to extend into the garden at Lark Hall.
ADDR - 74	Examination Submission **[REP2-028]**	Permanent access route	The new permanent access road for the EACN	Commitment for access to be maintained for the applicant and landowners with adequate means of security
ADDR - 75	Examination Submission **[REP2-028, REP1-394]**	Construction works	TB96 - TB98	Seek to restrict the southward movement of the construction Haul Road alignment, unless unavoidable to avoid breaking into the horse paddocks if possible.
ADDR - 76	Examination Submission **[REP2-028, REP1-306]**	Construction works	Salmons Lane	A short-term road closure is anticipated to be required to carry out this work. This will be confirmed during detailed design, and include further engagement with the landowner. Any closures would be planned and agreed with affected residences and business owners to ensure the minimal amount of disruption. Some work from the private access track is anticipated to be required in order to facilitate this crossing. However, access to the farm will be maintained at all times, and the majority of the work will be done from the fields and timings will be communicated to the relevant parties. Short closures of the private access track will be required for netting activities however the Contractor will liaise directly with the landowner to coordinate these works. Given the narrow characteristics of the private access it is likely that the netting activities could be managed with stop/go banksman controls.
ADDR - 77	Examination Submission **[REP2-028, REP1-245]**	Haul road, Construction works	TB67 - TB68	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations and engagement to investigate current extent of land drainage, as per **Outline Code of Construction Practice Commitment** References AS03 & AS05 **[REP2-014]**.
ADDR - 78	Examination Submission **[REP2-028, REP1-434]**	Mitigation measures	TB227 to TB229	Liaise with landowner during detailed design, construction and operation to maintain necessary biosecurity.
ADDR - 79	Examination Submission **[REP2-028, REP1-427]**	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 80	Relevant Representation **[RR-0406]**	Construction Works	RG14	Seek to minimise impacts of utility diversions on solar farm to the south of RG14 north as far as practicable
ADDR - 81	Relevant Representation **[RR-1490]**	Alignment	TB94	Move TB94 to the southwest to position, as far as practicable, the pylon and working area to avoid reduction in solar panel extent of consented solar farm proposals.
ADDR - 82	Relevant Representation **[RR-1392, RR-2117, RR-3478]**	Alignment	TB141	Seek to move TB141 as far as practicable along the alignment to southwest, to increase separation from property.
ADDR - 83	Relevant Representation **[RR-1447]**	Alignment	TB233	Move TB233 closer to the hedge unless following detailed design it is determined to not be practicable. Also liaise with landowner during detailed design and construction to minimise agricultural operations where practicable.
ADDR - 84	Relevant Representation **[RR-0463, RR-2143]**	Alignment	TB47	Seek to move TB47 within LoD as far south as far as practicable.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR-85	Engagement	Alignment	TB143	Seek to move TB143 to the west by an inline movement extending the preceding span (from TB141) subject to confirming electrical clearance requirements, upto 20m movement may be achieved without compromise to conductor pulling zone
ADDR-86	Engagement	CSEC	Fairstead	Seek to reduce the extent of land retained to the east of the Ccable Sealing Ends (CSEs) for soil storage and landscape planting to around 60m depth to return circa 3 hectares to agricultural cropping
ADDR-87	Engagement	Permanent Access route	TB141 to TB143	Subject to securing landowner agreement, secure permanent access to TB141 OHL pylon location (noting TB142 has been removed as a result of the scenario decision to replace three low height pylons with two standard lattice pylons) via the access to TB143 by voluntary agreements at the time of operational survey and maintenance access required.
ADDR-88	Engagement	Alignment	TB245	Seek to move pylon TB245 to the north (aiming for upto 50m) if practicable
ADDR-89	Engagement	Alignment	TB249 to TB253	Explore whether increased span lengths would allow either a reduction in pylon numbers or more pylons to be located on field boundaries. Liaise with landowner if appears viable.
ADDR-90	Engagement	Construction and Permanent Access Route	TB215 and TB216	As a result of track removal by landowner, agree appropriate alternative arrangements within OL to reduce farm impacts and permanent access at the time required to respond to cropping pattern
ADDR-91	Engagement	Permanent Access Route	TB227 to TB231	Retain proposed right of access but continue to investigate alternatives during construction and operation which may include securing voluntary agreements with other affected parties
ADDR-92	Engagement	Land take	East of EACN	Seek to agree arrangements re irrigation mains access
ADDR-93	Engagement	Land take	North of EACN	Seek to agree arrangements re Bund position and BESS access
ADDR-94	Engagement	Permanent Access Route	RG185 & RG186	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-95	Engagement	Alignment	TB224	Seek to move TB223 to TB224 as close to the gas pipeline as possible to move TB223 away from the solar panels and to increase alignment separation to residential property to the extent practicable
ADDR-96	Engagement	Construction Access	RG46 to RG48	Adjust haul road alignment to maximise use of existing hedgerow gaps
ADDR-97	Engagement	Permanent Access Route	RG191 to RG197	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-98	Engagement	Permanent Access Route	RG182 to RG184	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-99	Engagement	Permanent Access Route	RG113	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-100	Engagement	Environment and Construction Access	RG21	Microsite the alignment and route of the construction access to avoid Tree SN-0697 and its immediate surroundings to respond to advised sensitivities regarding scattered ashes. If encroachment close to the tree is unavoidable then ensure liaison with landowner to seek to minimise impact
ADDR-101	Engagement	Environment and Construction Works	TB168 to TB169	Utilise available alignment and height LOD and careful scaffold positioning to seek to retain lines of roadside memorial trees along the A414 Ongar Road and undertake appropriate crown management to avoid need for removal. If removal unavoidable then ensure liaison to seek to minimise impact.
ADDR-102	Engagement	Construction Access and Temporary Works	TB223	Seek, where possible, to microsite the access and compound arrangements to reduce overall landtake and increase separation to the Farmstead. Consider benefit of sequential uses and other adjustments..
ADDR-103	Engagement	Construction Access	TB94	Continue to liaise with landowner and solar developer to seek to identify opportunities to secure construction access with reduced impact on solar panels.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR-104	Engagement	Permanent Access Route	RG146 & RG147	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-105	Engagement	Permanent Access Route	RG148	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping patter
ADDR-106	Engagement	Permanent Access Route	RG29 & RG30	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.6
ADDR-107	Engagement	Permanent Access Route	RG35 & RG36	Avoid reducing space between hedgerow and fenceline to be below 40m where practicable
ADDR-108	Engagement	Alignment and pylon position	TB64	Seek to restrict westwards movement to maintain screening by agricultural barns as far as practicable
ADDR-109	Engagement	Permanent Access Route	RG22	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.6
ADDR-110	Engagement	Alignment and Pylon Position	RG31	Seek to position RG31 to the east and to a field boundary to the extent practicable and subject to outcome of ground investigation and relevant studies.
ADDR-111	Engagement	Underground Cable Alignment	JC Cable Chainage 0001-1000; Raydon Wings Aerodrome	Seek to position cable trenches as far to the eastern side of the Order Limits as practicable to minimise extent of incursion of the aerodrome runway enabling continued aviation operational use during construction, where possible
ADDR-112	Engagement	Construction Works and Reinstatement	Construction in proximity to Raydon Wings Aerodrome	Seek to agree appropriate positions of soil bunds, equipment storage and protective fencing with the aerodrome operator to minimise presence of temporary obstacles to continued aviation operations; seek to agree appropriate methods for soil compaction and re-seeding to enable effective and efficient runway reinstatement to minimise disruption of the aerodrome
ADDR-113	Engagement	Alignment and Pylon Position	RG103 to RG106 Mellis	For RG103 to RG106 seek to adopt the alignment and pylon positions of the removed 132kV lattice line as closely as possible. Similarly achieve necessary statutory clearances whilst seeking to avoid an increase in pylon number and keeping heights as low as possible. This is to maintain the distance between the Project and sensitive receptors including Mellis, and to minimise vegetation loss.

Appendix C. Applicant's Response to Essex County Council Appendix A [REP6-147]

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Appendix C
Applicant's Response to Essex County Council Appendix A [REP6-147]

Table C.1 Applicant's Response to EEC comments on Document 8.4.13 (REP5-201) and 8.4.12 (REP5-194)

Reference	Comment	Applicant's Response	Comment to Applicant's Response	Applicant's Response
Document 8.4.13 (REP5-201) Applicant's Response to Comments on its ExQ1 Responses				
3.16 ISH2 Action Point 43	Appendix E contains a table which provides the latest situation in relation to the structural assessments of 35 structures on the AIL routes. In summary, of the total 35 structures, 3 No. can accommodate the AILs with the remaining 32 No. requiring further work to determine whether the structures can accommodate the AILs. [Table appended to Appendix E of REP4-328 providing the latest situation on structural assessments of 35 structures on AIL routes	With information received since Deadline 4, the Applicant agrees with the status for all assets as listed by ECC in the table provided in Appendix E and will continue to engage with ECC on the appropriate matters. For those noted as requiring a height check (listed by ECC as ID 12, 13, 14 and 23 in Appendix E), AILs are proposed to pass under the structures only, with the largest anticipated vehicle being equal to but not greater than 5m.	The height of the largest AILs is noted as 5m. Applicant and ECC to discuss.	This statement noting 5m originates in response to EEC's table of structures in Appendix E of **REP4-328**, where ECC requested for specific structures where AIL vehicles are proposed to pass under: 'check height if >5m'.The Applicant confirms that the largest vehicle anticipated and assessed is 5m and therefore lower than ECC's threshold for checking structure heights. This is noted in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**, within the specification for a typical Cable Drum AIL delivery vehicle. The Main Works Contractor will, however, confirm vehicle specifications once material and equipment requirements have been confirmed and will continue to liaise with ECC on this matter as part of finalising the AIL delivery routes.
Document 8.4.12 (REP5-194) Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points				
ISH2 Action Point 44	The Applicant has updated Section 6.6 of 7.3 Outline Construction Traffic Management Plan [Revision C] to include a commitment to engage with other forums set up and managed by other Local Highway Authorities. The Applicant will engage with the LHAs to understand the suitable forums which could be used to communicate (including the Planning and Infrastructure Working Group (Ardleigh and Little Bromley)) relevant information throughout the construction period. The	The Applicant is continuing to engage with the LHAs on this matter, and will provide an update within later iterations of 7.3 Construction Traffic Management Plan, prior to the end of the examination.	ECC understand the Applicant will be providing a suggested approach to the Developer Forum required by ECC and look forward to agreeing high level commitments on how this is delivered and interacts with the other forums requested by various stakeholders.	The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision F]** to include proposed high level principles for the Developer's Forum.

Reference	Comment	Applicant's Response	Comment to Applicant's Response	Applicant's Response
	Applicant will provide an update at Deadline 5. The Applicant will include before the end of examination additional detail on the coordination and collaboration within Section 6.6 in later iterations of 7.3 Outline Construction Traffic Management Plan [Revision C], which is secured through Requirement 4 of Schedule 3 of 3.1 Draft Development Consent Order [Revision D].			
ISH2 Action Point 46	Applicant and Suffolk County Council to discuss the inclusion of non-PARs in the outline construction traffic management plan (CTMP) and the assessment of environmental effects, and provide further written comments to summarise the issue and discussions to date.	The Applicant held discussions with Suffolk County Council in a meeting to discuss Statements of Common Ground (SoCG) held on 1 June 2026, where discussions focused primarily on the other traffic and transport elements of the SoCG. The Applicant has responded on the subject of non-PARs in Item 11.4e of 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]. The Applicant has scheduled an additional meeting with Suffolk County Council for 17 June, where "Under discussion and Not Agreed" items within the SoCG (expected to include the non-PARs) will be discussed. The Applicant has provided an update within 5.9.6 Draft Statement of Common Ground – Suffolk County Council (SCC) [Revision D].	ECC wish to highlight that discussions were also held between the Applicant and ECC about including detail on the non-primary access routes – in particular identifying the junctions in the CTMP, summarising how they are likely to be used (signposting to other documents where necessary) and stating how the number of vehicles using them will be negligible. This is to ensure the Contractor is fully aware that these routes are for minimal use only and to provide comfort to the Local Highway Authority that the impacts are minimal and so do not require assessment.	**7.3 Outline Construction Traffic Management Plan [Revision F]** includes detail on the activities which may require the use of the non-PARs. The routing of construction vehicles from the SRN has not been confirmed at this stage of the project development. The Main Works Contractor(s) have committed to a three-month lookahead and the delivery routes and timings would be communicated by the Main Works Contractor(s) to all companies and/or drivers involved in the transport of materials and plant to and from site by HGV construction vehicles. The three-month lookahead will be shared with Essex County Council, as the relevant highway authority. The Applicant and Main Works Contractor(s) will continue to discuss these arrangements with Essex County Council during the development of the final CTMP post-DCO.
ISH2 Action Point 22, Table 3.8	ECC welcomes the Applicant's confirmation of its commitment to joining and engaging in the Developer's Forum to help facilitate coordination between developments. Given the potential impact of the project, a Developers Forum is considered a necessary form of mitigation and a commitment to engagement should form part of the DCO. It is ECC's view this should be captured through s106 unilateral undertaking as this would provide greater	The Applicant considers that the appropriate mechanism to recover costs in relation to the ECC Developer Forum is through a Planning Performance Agreement (PPA). This is the same mechanism that has been successfully utilised for cost recovery for the Council's resources during pre-application and examination of the Project, and will be utilised for the post-consent phase.	ECC's preference is to capture this important commitment in a s106 Agreement as it provides greater surety.	The Applicant has already committed, through section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision F]**, to join and engage with a Developer's Forum to be set up by ECC. The Applicant considers that the inclusion of a commitment within the Outline CTMP provides an appropriate and robust mechanism for

Reference	Comment	Applicant's Response	Comment to Applicant's Response	Applicant's Response
	surety on delivery. The alternative via PPA is an option but is not as definitive as through a s106 Agreement.			securing engagement with the Developer's Forum. Compliance with the Outline CTMP will be secured through Requirement 4 in **3.1 Draft DCO [Revision G]** requiring the submission and approval of a final (detailed) CTMP substantially in accordance with the certified Outline CTMP. Alongside the commitment in the Outline CTMP, the Applicant is discussing with ECC the recovery of ECC's appropriate costs (i.e. the funding aspect), such as the Developer's Forum costs, through a Planning Performance Agreement (PPA).
ISH2 Action Point 22	To support implementation of the project, ECC considers appropriate funding will need to be available to cover the time that ECC officers will need to spend in providing oversight of the various mitigation and commitments that have been included in the DCO documentation, as well as the points raised in ECC's Local Impact Report. ECC would welcome further discussion with the Applicant on how this can be achieved so that any costs involved in supporting the implementation of the Project are cost neutral to ECC.	The Applicant has begun discussion with host authorities in relation to the potential use of PPAs to support resourcing officer time post-consent. Any arrangements would be progressed separately.	ECC's preference is to capture this important commitment in a s106 Agreement as it provides greater surety.	The Applicant considers that the use of PPAs is more appropriate given the following: i) The full scope and details of ECC's costs cannot yet be determined ii) Not all of ECC's costs would comply with Regulation 122 of the Community Infrastructure Levy (CIL) Regulations.
ISH2, Action Point 43	Appendix E contains a table which provides the latest situation in relation to the structural assessments of 35 structures on the AIL routes. In summary, of the total 35 structures, 3 No. can accommodate the AILs with the remaining 32 No. requiring further work to determine whether the structures can accommodate the AILs. [Table appended to Appendix E of REP4-328 providing the latest situation on structural assessments of 35 structures on AIL routes].	With information received since Deadline 4, the Applicant agrees with the status for all assets as listed by ECC in the table provided in Appendix E and will continue to engage with ECC on the appropriate matters. For those noted as requiring a height check (listed by ECC as ID 12, 13, 14 and 23 in Appendix E), AILs are proposed to pass under the structures only, with the largest anticipated vehicle being equal to but not greater than 5m.	The height of the largest AILs is noted as 5m. Applicant and ECC to discuss.	This statement noting 5m originates in response to EEC's table of structures in Appendix E of **REP4-328**, where ECC requested for specific structures where AIL vehicles are proposed to pass under: 'check height if >5m'. Therefore the Applicant is providing confirmation that the largest vehicle anticipated and assessed is 5m. This is noted in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**, within the

Reference	Comment	Applicant's Response	Comment to Applicant's Response	Applicant's Response
				specification for a typical Cable Drum AIL delivery vehicle. The Main Works Contractor will, however, confirm vehicle specifications once material and equipment requirements have been confirmed and will continue to liaise with ECC on this matter as part of finalising the AIL delivery routes.

Table C.2 Applicant's Response to comments on Outline Construction Management Plan (REP5-150)

Reference	Comment	ECC Comment	Applicant's Response
Paragraph 5.4.2, p32	The applicant has updated the paragraph to confirm more detail on the Non-Primary routes.	ECC welcome the additional detail. However, ECC did discuss with the National Grid Team about including a commitment in the paragraph preceding the Table 5.2 which sets out that traffic associated with these types of works would be minimal and setting out the likely vehicle types. This is to ensure that the Contractor is fully aware that the use of these access points are for small amounts of traffic only. Our concern is that if this is not identified then there could be an intensification of these routes that have not been assessed and will be difficult to manage if there are issues identified. ECC also discussed whether the Non-Primary Access locations could be listed for clarity.	Table 5.2 in **7.3 Outline Construction Traffic Management Plan [Revision F]** includes the indicative vehicle types which could be used to complete the activities listed within Table 5.2. The construction traffic associated with the non-PAR activities is expected to be low and short-term in duration and is not expected to have an environmental impact. The Main Works Contractor(s) have committed to a three-month lookahead in terms of construction traffic movements. This will capture the volume of traffic associated with the non-PARs coupled with routing information. This information will be provided to Essex County Council as the relevant Local Highway Authority. The list of non-PARs cannot be provided at this stage of design development, and the Main Works Contractor will liaise with Essex County Council in the development of the final CTMP post-DCO.
CTMP		Refer to Appendix 3A in REP 5-242 which sets out the wording that ECC have requested against what has been included in the Deadline 4 submission along with queries on the wording proposed by the Applicant. ECC reiterate the text updates that ECC require to be included in the CTMP. In summary these include: • Commitments to site observations for school routes • High level principles of Developer's Forum • Review of structures for PARs on rural highway network • Comparison of traffic numbers • Amended wording in relation to review of CTMP	The Applicant has discussed the matters detailed below with Essex County Council (ECC) in meetings held regarding the Statement of Common Ground (SoCG). • Commitment to site observation for school routes: The Applicant considers that the review it has undertaken of the schools is robust and appropriate. However, noting that ECC has remaining concerns, the Applicant is committed to continue discussions with ECC, which will likely conclude during the detailed design stage. • High Level Principles of Developer's Forum: The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision F]** to include high level principles relating to the Developers Forum. • Review of structures: The Applicant provided a response in **8.4.14 Applicants Comments on**

Reference	Comment	ECC Comment	Applicant's Response
		• Commitment to discuss ways of reducing freight by road • Specifying staff working hours and access time restriction to the site • Monitoring of HGV parking (Resting Facilities) • Commitment to including car parking demand and supply as part of access design approvals • Amended wording in relation to access to the ECC Depot • Update to Table 6.1 to include monitoring of vehicle movements and Section 6.4.1 to include levels of traffic in non-compliance list • A list of possible corrective actions including extending the programme of works, warnings, closure of compounds/on site parking, implementing additional shuttle buses	**Further Information or Submissions Received by Deadline 5 [REP6-115].** The Main Works Contractor(s) will undertake a further review of the suitability of diversion routes in line with typical road closure procedures. The Applicant has agreed to provide ECC with diversion route information to identify any other weak structures that may impact the suitability of diversion routes. • Comparison of traffic numbers: **7.3 Outline Construction Traffic Management Plan [REP6-082]** was updated at Deadline 6 to include additional information on the three-month lookahead and comparison of traffic numbers. The comparison of HGV movements has been added to Table 6.1 to detail the responsibility rests with the Transport Coordinator Role. • Review of the CTMP: The Applicant provided a response in **8.4.14 Applicants Comments on Further Information or Submissions Received by Deadline 5 [REP6-115].** • Reducing freight by road: **7.3 Outline Construction Traffic Management Plan [REP6-082]** was updated at Deadline 6 to reflect the commitment "*The Main Works Contractor(s) will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items. The contractor will review and discuss ways of reducing freight by road with each Local Highway Authority, with a coordinated approach where feasible and practicable.*" Staff working hours and restricted access to the site: The Applicant provided a response in **8.4.14 Applicants Comments on Further Information or Submissions Received by Deadline 5 [REP6-115]** and does not consider it necessary to impose restrictions on staff arriving at, or leaving site, and considers that it would have adverse health and safety implications, for instance, in case of emergencies. Monitoring of HGV Parking: The Applicant has already committed in **7.3 Outline Construction Traffic Management Plan [Revision F]** that the Main Works Contractor(s) will prepare a driver information pack to be issued to each construction vehicle driver. The driver information pack will be specific to each Primary Access Route (PAR). The Applicant will commit further, in the Outline Construction Traffic Management Plan [Revision G] to be issued at Deadline 8, that the driver information pack will identify appropriate lorry parks, services and other

Reference	Comment	ECC Comment	Applicant's Response
			designated overnight parking locations; include information in general on inappropriate locations for waiting or parking; and identify specific locations along or adjacent to a PAR where it would not be appropriate to wait or park. The drive through surveys of the PARs will be used to identify these locations. The Main Works Contractor(s) will monitor HGVs that it owns and operates to check for parking in inappropriate specific locations along or adjacent to a PAR and take corrective action in line with the non-compliance procedure detailed in Section 6.3 of Outline CTMP. Commitment to including car parking demand and supply: as stated in **8.4.14 Applicants Comments on Further Information or Submissions Received by Deadline 5 [REP6-115].** • Sufficient parking is expected to be provided and the level of provision will be refined during detailed design phase • Parking at compounds will be limited and all spaces allocated • The TPC will monitor use of visitor parking bay The removal of vehicles would only be an option for vehicles owned by the Main Works Contractor(s), not including staff company cars. Monitoring of non-compliance is the realistic approach, with disciplinary process to be followed. For other parties' contractors, visitors or delivery drivers breaches of site rules included, in the induction, could result in them being barred from site. Amended wording in relation to ECC Depot: The Applicant provided a response in **8.4.14 Applicants Comments on Further Information or Submissions Received by Deadline 5 [REP6-115]** and the Applicant considers the matter closed. Table 6.1 update: **7.3 Outline Construction Traffic Management Plan [Revision F]** was updated to reflect this request and the Applicant considers the matter closed. Possible Corrective Actions: The applicant provided a response at Deadline 6 in **8.4.14 Applicants Comments on Further Information or Submissions Received by Deadline 5 [REP6-115]**, with **7.3 Outline Construction Traffic Management Plan [REP6-082]** updated to include additional information on the non-compliance and enforcement procedure.

Table C.3 Applicant's Response to comments on Outline Construction Worker Travel Plan (REP-152)

Comment	Applicant's Response
ECC reiterate our requirement for a mini-bus service(s) to be implemented by the Contractor to pick up/drop off between the site and various key locations/transport nodes.	The Applicant has committed in **7.3 Outline Construction Traffic Management Plan [Revision F]** to the Main Works Contractor(s) exploring the feasibility of a mini-bus to site. This provides certainty that the Main Works Contractor(s) will give due consideration to transporting workers to site by mini-bus. The Applicant considers that this commitment aligns with paragraph 5.14.12 of Overarching National Policy Statement for Energy (EN-1), which refers to identifying opportunities to consolidate trips, opportunities for shared mobility and re-moding of travel to a more sustainable mode. Given the linear and mainly rural nature of the Project, the Applicant wishes to ensure that any shared mobility is feasible, operationally reasonable and truly effective. ECC will have the opportunity to feed into this matter further during detailed design and as part of the approval of the final CTMP, to be produced by the Main Works Contractor(s) Post-DCO.

Appendix D. Applicant's Response to Essex County Council Appendix B [REP6-147]

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Appendix D
Applicant's Response to Essex County Council commentary on the Revised Draft DCO (REP5-061, Revision E)

The Applicant's responses to the substantive points raised by Essex County Council commentary on the Revised Draft DCO (REP5-061, Revision E) are provided below. The text below reproduces the introduction as provided by Essex County Council including tracked changes. It has been reproduced for completeness only.

D.1 Introduction

1) This is the third version of the document. Version 1 was submitted at Deadline 2 and Version 2 was submitted at Deadline 3.

2) ECC's main DCO drafting comments are concentrated in section 5 of the LIR (REP1-161), covering the Articles, Requirements, discharge of requirements, protective provisions and certified documents. Additional issues were raised in earlier versions of this document., ~~with the main additional DCO-related points in REP2-036 being the need to secure the drainage strategy in the dDCO and a design requirement for the EACN/substations to align with the Joint Substations Design Guide and colour palette. ECC has checked those points against the updated Revision C tracked dDCO (REP3-005) submitted by the Applicant at Deadline 3.In broad terms, only a limited number~~ Some of ECC's points have been picked up but many remain in issue; a number have also been taken away for further consideration. The updated table below picks up ECC's suggestions, addresses various of the Applicant's responses and sets out why the dDCO should still be amended to reflect ECC's suggestions.

D.2 REP 3-005 Draft dDCO Revision C

3) In Revision C of the dDCO, submitted at Deadline 3, the Applicant has picked up some further points of ECC's drafting comments, principally relating to:

- a. conversion of various periods to "business day" equivalents in response to ExA Question DCO 1.A3 (although in most instances without extending the underlying period as ECC sought); b. replacement of the phrase "former use" with "former condition" in
- Schedule 3 Requirement 10;
- c. the addition of "following consultation with the relevant county planning authority and, if relevant, Historic England" in Schedule 3 Requirement 5 (Archaeology);
- d. the addition of consultation with the relevant highway authority for the construction traffic management plan in Schedule 3 Requirement 4 and the application of all approved plans to all stages of the authorised development; and

- e. the addition of a new sub-paragraph (2) to Schedule 3 Requirement 11 securing the external colour of certain Work No. 18(b) buildings.

4) The substantive content of the majority of ECC's outstanding points has not been addressed and the table below has been updated to reflect that position.

5) In REP 3-074 the Applicant responded to the ExA's questions on the drafting. ECC has provided its responses to the Applicant as part of the Statement of Common Ground negotiations, in the hope that an agreed position can be reached. On the time periods in Articles 11(3), 14(5), 17(2), 20(9), 49 and 50, ECC notes that agreement is unlikely. As flagged to the Applicant, its response in REP 3-074 raises similar issues on those articles, often with reference to the £7 million per day delay figure. This is a programme-wide figure for late energisation; it is not a credible justification for setting decision periods that, if missed, trigger deemed consent. The risk to the programme arising from a 35-day or 42-day decision period is materially less than the risk to environmental outcomes arising from deemed consent on inadequate review.

REP5-061 Draft dDCO Final Issue E

6) The Applicant has taken up a limited number of further points since Revision C, principally:

- a. the addition of Requirement 15 (Employment and Skills Plan) and its certification, although issues remain with the wording;
- b. a new Schedule 4 'requirement consultee' notification and consultation mechanism; and
- c. a substantial restructuring of Requirement 5 (Archaeology). The substantive majority of ECC's outstanding points – including the absence of a CEMP, the 'submission not approval' of stage schemes (Requirement 3), the retained decision / deemed-consent periods, the pre-commencement operations definition, the limits of deviation, and decommissioning – remain unaddressed. Three further matters now arise from the ExA's Rule 17 letter of 30 June 2026 and are added as new rows at the foot of this table.

Table D.1 Applicant's Response to Essex County Council commentary on the Revised Draft DCO (REP5-061, Revision E)

Response

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
Use "day" / "business day" / "working day" consistently, with periods of 7 days or less expressed as business days Use "business days" in Schedule 3	REP1-161	Picked up	Revision C update: the Applicant has now converted a substantial number of provisions to "business days", including: Articles 11(3) (28 to 25 business days), 14(5), 16(8), 17(2), 20(9), 22(8), 27(4), 28(4), 35(2), 49(10) and 50(5) (Ref 12 in the Schedule of Changes); Article 21(5) (14 to 10 business days); Article 23 (56 to 40 business days); Article 49(4) (7 to 5 business days); Article 56(3)(b) (21 to 15 business days); Schedule 3 Requirements 3(1) (7 to 5 business days) and 3(4) (28 to 25 business days); and Schedule 4 paragraph 2 (5 days to 5 business days; 21 days to 15 business days).	No response required.
Article 2: Narrow the definition of pre-commencement operations so extensive compound/laydown/ bell-mouth works cannot proceed without proper control, or add a materially new/materially different effects safeguard	REP1-161	Not picked up	Article 2 still includes substantial compound/set-up works within pre-commencement operations. At the very least, the establishment of construction compounds should be removed. The suggested tailpiece should be added: "excluding those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority." Revision E update: Not picked up in Revision E. The Article 2 definition of 'pre-commencement operations' still expressly includes 'set up works associated with the establishment of construction compounds and temporary laydown areas', and no materially new / materially different environmental effects safeguard has been added. ECC's point remains outstanding.	Please refer to **8.2.2 Applicant's Comments on Local Impact Reports [REP2-030]**, in particular pages 212 to 213. The Applicant's position remains that the scope of pre-commencement operations is proportionate and appropriate in the circumstances of this particular CNP project and that these works are already sufficiently controlled within the framework of the DCO and other control documents without the need for further restriction or the addition of a tailpiece.
Article 2: Include listed building surveys within pre-commencement operations	REP1-161	Picked up	Article 2 definition of "pre-commencement operations"	No response required.
Create a central repository / up-to- date public environmental information source	REP1-161	Not picked up	A new provision should be included	Please refer to the Applicant's response on the register of requirements under the heading "Schedule 3" in this table.
Articles 2 and 4: Qualify "maintain" so maintenance works cannot give rise to materially new/materially different environmental effects without control	REP1-161	Not picked up	ECC's suggested additional wording in REP1-161 §5.2.11 to give control to the relevant local planning authority has not been added, nor has Article 4 been amended to incorporate any mechanism for addressing materially new or different environmental effects from those assessed in the ES. The Applicant's statutory duty to maintain a safe and efficient transmission network is obviously no answer to this as it would be a reason not to include any safeguards in the DCO.	The Applicant notes the concern raised by Essex, however, it would reiterate that as a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. As transmission licence holder, the Applicant is the appropriate body with the expertise to discharge its statutory

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
			Revision C update: Article 4 (Maintenance of authorised development) has been amended in Revision C (Ref 5 of the Schedule of Changes), but only to give UKOP authority to maintain the new Work No. 17A (UKOP protective works), rather than to qualify the meaning of "maintain" as ECC has sought. Article 2 has not been amended in Revision C in any way relevant to ECC's point. ECC's substantive concern therefore remains.	duties in respect of electricity equipment. It is essential that the Applicant is not delayed or prevented from carrying out essential maintenance that enables it to comply with this duty. The Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, "provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement", is included in the definition of "maintain". Furthermore, it would not be appropriate to require the Applicant to approach the relevant planning authority prior to carrying out emergency repair works which also fall within the definition of 'maintain'. The Applicant maintains its position that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant as is common on electricity projects such as this. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. A failure to comply with a term of the DCO would be an offence that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008. As noted above, the Applicant's current approach to maintenance has precedent in a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and the Applicant does not consider it

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				necessary or appropriate to depart from such precedent in this case.
Article 2: Define omitted outline management plans (for example CEMP, noise and vibration, dust) Also Schedule 3 Requirement 4 re lack of CEMP Article 48 Defence to proceedings in respect of statutory nuisance	REP1-161 Note CEMP also raised by Chelmsford	Not picked up	The Applicant relies on the reference in Schedule 3 Requirement 4 to the Code of Construction Practice, to which various documents are appended that it states include all the information typically found in a CEMP (REP2-030 pg 151). ECC reiterates it is not clear that the proposed Code of Construction Practice (even with daughter documents) will provide the same sorts of protections as a CEMP. In order to avoid a chase through documents to identify the environmental controls on construction, which are key to the acceptability of the project, a CEMP should be required and secured in Requirement 4 (the B2T DCO requires such a plan.). The other plans could easily be referred to explicitly. The need for a separate Noise and Vibration Management Plan is also justified by the extent of the Article 48 defence. Revision C update: Schedule 3 Requirement 4 has been amended in Revision C (Ref 33 of the Schedule of Changes) to add consultation with the relevant highway authority on the construction traffic management plan, and to make the requirement to comply with approved plans apply to all stages of the authorised development. However, no CEMP, Noise and Vibration Management Plan or Dust Plan has been added to Article 2 or Requirement 4. ECC's substantive point therefore remains.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the 7.2 Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), including an outline Noise and Vibration Management Plan at Appendix F; therefore, a separate CEMP and Noise and Vibration Management Plan are, in the Applicant's view, not required.
Article 2: Define "provisional advance authorisation"	REP1-161	Picked up	Article 2	No response required.
Article 3(1): make clear authorised development is to be carried out within the Order limits	REP1-161	Not picked up	The Applicant stated in REP2-023 of 289 that Article 3(7) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the 2.3 Works Plans [APP-017 – APP-024], subject to article 5 (limits of deviation) and to the Requirements, so the Applicant does not consider any further clarification is required. The amendment prevents this kind of chase, and follows the drafting of previous DCOs (B2T; Yorkshire Green Energy). The amendment should be made.	Please refer to the Applicant's responses in **5.9.3 Draft Statement of Common Ground - Essex County Council [Revision F].** The Applicant's position remains that Article 3(8) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the 2.3 Works Plans (Revision C) subject to article 5 (limits of deviation) and to the Requirements. The Applicant does not consider any further clarification is required. Paragraph (7) specifies that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				extent that they are required by or incidental to the carrying out of the authorised development, as permitted by section 120(3) of the Act. There is precedent for this in the North Killingholme (Generating Station) Order 2014. Although this provision was removed from the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the scope of the power is not inconsistent with the works authorised in Schedule 1 (authorised development) and is clearly stated to apply for the purposes of the authorised development only. These precedents do not include a mechanism for assessing and addressing any materially new or materially different environmental effects and National Grid considers it appropriate to include this provision in this Order, without amendment, taking into consideration the scale and urgency of the Project.
Article 3(6): add a mechanism for assessing and controlling materially new/materially different environmental effects	REP1-161	Not yet picked up	The Applicant has noted ECC's point on article 3(6) and will review and consider whether this can be included in a revised dDCO to be submitted at Deadline 3 (REP2-030 pg 152)	Please refer to **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]**.
Article 4 / general DCO drafting should contain an in-principle obligation to decommission obsolete works	REP1-161	Not picked up	There is a decommissioning requirement in Schedule 3, but not the broader in-principle Article- level obligation ECC sought. That still belongs in Article 4 and/or a strengthened Requirement 13. The Applicant's response (REP2-030 pg 153), that as a transmission licence holder, it has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system, is no answer to the DCO to specify an obligation to decommission obsolete works.	Please refer to the Applicant's response to DCO 2.S12 in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**.
Define "lines or situations" in Article 5	REP1-161	Not picked up	This still needs definition in Article 5 / Article 2.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the term 'lines and situations' is a commonly used and understood term in development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				2024. The Applicant does not consider that this term needs to be defined.
Article 5: Tighten limits of deviation, especially pylon height, underground cable depth and sensitive area controls; require prior approval where exceeded	REP1-161	Not picked up	This still needs amendment in Article 5. The Applicant has not engaged with ECC's reasoning and just asserted that the justification is sufficient (REP2-030 pg 153), while repeating (at pg 144) the same justification given in the Explanatory Memorandum, which ECC explained in the LIR was not sufficient. The Applicant has not engaged at all with the detailed information and list of designated heritage assets at LIR §5.3.9 (REP1-161)	Please refer to the Applicant's responses in **5.9.3 Draft Statement of Common Ground - Essex County Council [Revision F],** and the Applicant's responses to DCO 1.A15, DCO 1.A16 and DCO 1.A17 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Where appropriate, the Applicant has tightened the limits of deviation, for example, where necessary for the safe operation of Ministry of Defence assets and where infrastructure is in proximity to particularly sensitive receptors. These constraints have been considered on a case by case basis and are secured either in the **3.1 Draft DCO [Revision G]** or in the **7.2 Outline Code of Construction Practice [Revision G]**. Heritage - Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated for all heritage assets, including those assets noted in 5.3.9 in the **Local impact report [REP1-161]** by ECC, due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in **7.2 Outline Code of Construction**

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				Practice [Revision G] to restrict the longitudinal LoD. The assessment in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within **2.3 Works Plans**.
Clarify Article 11(2) process for works outside the Order limits	REP1-161	Explanation given in REP2- 030	The Applicant's explanation, in REP2-030 pg 156 is: "Where that scenario occurs, the Applicant's expectation is that planning permission (and indeed any further ancillary consents) will be required where works to be undertaken within any part of the highway outside of the Order limits comprise development within the meaning of Section 55 of the Town and Country Planning Act 1990. However, it would not be appropriate for the draft Development Consent Order to attempt to address all such eventualities (especially those which are already controlled as a matter of general planning law) and, particularly, to prescribe steps to be taken in respect of operations outside of the Order limits."	No response required.
Article 11(3): extend deemed consent / decision period from 28 to 35 days Article 14(5): extend period from 28 to 35 days Article 17(2): extend period from 28 to 35 days	REP1-161 & REP2-036	Not picked up	There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better.	Please refer to the Applicant's response to DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** its comments on responses to DCO 1.A2 in **8.4.13 Applicant's Response to Comments on its ExQ1 Responses [REP5-201]** and in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the current decision-making period of 25 Business Days is considered to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
Article 20(9): increase period to 42 days for discharge of water consents Article 49: extend TRO deemed consent periods to 42 days Article 50: extend felling/lopping deemed consent period to 42 days	REP1-161 & REP2-036	Not picked up	There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better.	Please refer to the Applicant's response to the previous comment on timescales above.
Articles 12 and 16: TTRO/temporary closure periods too short; should reflect permit/PAA timing, specify closure duration, and revise bridleway diversion drafting	REP1-161 & REP2-036	Not picked up	Still needs amendment in Articles 12 and 16 so that TTRO timing/process is expressly aligned with the permit/PAA regime. The Applicant has "acknowledged" ECC's position, but still asserts there is no reason for a longer time period than 28 days (REP2.030 pg 156). ECC's response is given in its Deadline 3 Responses. Revision C update: Article 12(8) has been amended (Ref 12 of the Schedule of Changes) in response to DCO 1.A21 to clarify the position where the undertaker uses more than one appeal mechanism, but the underlying TTRO/PAA timing concern raised by ECC has not been addressed. Article 16(8) has been converted to business days only. ECC's substantive points remain.	Please refer to the Applicant's response to the previous comment on timescales. The Applicant has updated Article 12 to clarify how the timings in the **3.1 Draft DCO [Revision G]** and any relevant permit scheme would apply in practice. The Applicant responds to ECC's position on the duration of temporary closures and scope for betterment to bridleways in the **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. ECC will appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary closure. Some temporary closures will be very short, whilst others may need to be slightly longer. **7.3 Outline Construction Traffic Management Plan [Revision F],** which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				further details on these temporary closures. The wording of Article 16(6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC.
Article 18: make clear undertaker maintains non-adopted highway works until removal/restoration, and address shared infrastructure / collaboration arrangements	REP1-161	Not picked up	ECC's Deadline 3 Response gives its response to the Applicant's reasons for not making the amendments.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that Article 18(1) and (2) each include an "unless otherwise agreed with the street authority" caveat to the maintenance provision for streets constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by Article 27 (Temporary use of land by National Grid) to reinstate the land to the reasonable satisfaction of the owners of the land. The Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. The **7.3 Outline Construction Traffic Management Plan [Revision F]** further notes that the Main Works Contractor will liaise with the relevant

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management.
Articles 50 and 51: powers over vegetation are too wide; define "near" and "affected vegetation" or specify parameters	REP1-161	Not picked up	Articles 50 and 51 and any linked plans/definitions need to be amended.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that . A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. The article does not authorise the Applicant to do anything that is not necessary. Further controls in connection with veteran and ancient trees were included in Article 50 and 51 at Deadline 6 (3.1 Draft DCO [REP6-030]. The Applicant further maintains that given affected vegetation and how it is affected is clearly shown on **2.16 Trees and Hedgerows to be Removed and/or Managed Plans** (i.e. "affected managed" or "potentially affected"), it is unclear why a definition of "affected vegetation" is required.
Article 51: require advance notice and allow reasonable conditions	REP1-161	Not picked up	This should be added to Article 51.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the Applicant does not consider it necessary to include a notice provision and notes that such provisions are not included in other recent development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024.

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
Article 56(3)(b): 21-day period should begin five business days after notice, not two	REP1-161	Not picked up	Article 56(3)(b) should be amended. The Applicant does not engage with ECC's point on adequate time being needed for all parties engaged in the process (REP2-030 pg 161) Revision C update: Article 56(3)(b) has been amended (Ref 24 of the Schedule of Changes) to convert the 21 days into 15 business days in response to DCO 1.A3, but the "two business days after notice" trigger point that ECC asked to be extended to five business days has NOT been amended. ECC's point therefore remains.	The Applicant remains unclear why ECC seeks this amendment since it is only the Applicant who would benefit from the proposed extension of time and the Applicant is content with the timescales it has proposed. The Applicant is keen that it does not unnecessarily contribute to any delay to other planning decisions being made. The obligation simply gives the Applicant a 15 business day consultation period (plus two business days to account for service of the request for comments) during which the relevant planning authority is not permitted to communicate a decision). A further three business days just means that the LPA is prevented from communicating its decision on other planning matters for a further three business days. However, should the Examining Authority consider it necessary and appropriate to extend the time period to five business days, the Applicant would not object.
.Schedule 3: Add a Register of Requirements	REP1-161	Not picked up	This would need a new Schedule 3 requirement.	The Applicant has responded to this point most recently in response to Braintree DCO 2.S16 **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]** where we said "Should the Application submit documents to DESNZ to discharge a DCO requirement (if a specialist unit should be set up following the publication of the Nuclear Regulatory Review 2025) the Applicant is currently exploring options around establishing a 'register of requirements' which would provide for an electronic form of documents to be available publicly. This is being considered for a future update to the Draft DCO." Given the host authorities' preference for a call-in mechanism in relation to requirement discharge (a position which the Applicant does not endorse)

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				it would be premature to introduce additional drafting at this stage pending resolution of the broader governance arrangements for requirement discharge. Notwithstanding this position, the Applicant does not object in principle to the inclusion of a provision requiring the maintenance of a publicly accessible register of applications, approvals and related documentation where DESNZ is the relevant discharging authority. Should the Examining Authority consider it necessary to have a register of requirements in this situation, the Applicant would propose the following wording, which is adapted from Schedule 2 (requirements) of the A122 (Lower Thames Crossing) Development Consent Order 2025: "*Register of requirements [xx].—(1) The undertaker must, as soon as practicable following the making of this Order, establish and maintain in an electronic form suitable for inspection by members of the public a register of those requirements contained in this Schedule 3 in respect of approval or agreement is sought from the DESNZ unit.* *(2) The register must set out in relation to each such requirement the status of the requirement, in terms of whether any approval or agreement to be given by the DESNZ unit has been applied for or given, providing an electronic link to any document containing any approved or agreed details.* *(3) The register must be maintained by the undertaker for a period of 3 years following completion of the authorised development."*
Schedule 3 definition of "reinstatement planting" should distinguish replacement planting from mitigation/compensation planting	REP1-161	Not picked up	Requirement 1 definition still rolls these concepts together. The Applicant states (RAP2-030 pg 162) that the terms are explained in the Outline Landscape and	The Applicant does not agree that the definition should distinguish between replacement planting and mitigation

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
			Ecological Management Plan, but it is not clear that is so. AS-046 defines "compensation" and "landscape compensation" and "landscape mitigation". To avoid chasing through the document, it would be sensible to include definitions in Schedule 3.	planting. The definition has been drafted deliberately to capture all planting secured through **7.4 Outline Landscape and Ecological Management Plan [Revision G]** that is intended to be subject to the provisions of Requirement 9 (Reinstatement planting plan), including embedded planting, reinstatement planting, mitigation planting and the on-site elements of the 3:1 tree planting commitment. The requirement already provides sufficient clarity as to the planting to be approved and delivered, and the Applicant considers that introducing further distinctions would add unnecessary complexity without changing the operation or effect of the requirement. This definition is precedented in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
Schedule 3 Requirement 3: stage submissions should be for approval, not merely notification	REP1-161	Not picked up	The Applicant resists this on the basis of potential delay, specialist technical considerations and tight programming constraints (REP2-030 pg 163). The relevant LPA will have the technical ability to engage (hence the requirement to notify); the Applicant does not answer ECC's point on the need for approval given the potential for cumulative impacts arising from the project. Revision E update: Not picked up in Revision E. Requirement 3(2) still requires the written scheme setting out all stages only to be submitted to the relevant planning authority, not approved. This is reinforced by the ExA's R17 letter (Q1(a) – management plans to be approved; and Q1(b) – securing mitigation of intra-project cumulative effects): without an approval gate there is no mechanism requiring assessment of the combined effect of concurrent activities across stages on a common receptor. ECC's point is strengthened, not resolved.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the Applicant cannot accept submissions under Requirement 3(2) being for approval by the relevant planning authority. Given the scale of the Project, the large number of local authorities within the Order Limits and the complexities of delivering such a large project within a limited timeframe, it is not appropriate or proportionate for the Applicant to seek each authority's consent to the written scheme setting out the stages of the authorised development. Additionally, there are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				to begin construction of the development and to achieve energisation by 2030.
Schedule 3 Requirement 3(a): clarify how far in advance any revisions to the written scheme should be submitted to the relevant planning authority	REP1-161	Not picked up	The only reason given by the Applicant is drafting in other DCOs. ECC considers it would be a helpful clarification in this dDCO.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that providing a timescale on prior notice under paragraph 3(a) is not necessary. The purpose of paragraph 3 is to ensure that the relevant planning authority is kept informed of the staging of the authorised development. Paragraph 3(a) requires revisions identified before the commencement of the relevant stage to be submitted before that stage commences, while paragraph 3(b) separately addresses revisions identified only after commencement by requiring them to be submitted within 10 business days of implementation. As the written scheme is submitted for information only, prescribing a minimum notice period in advance would not provide any additional certainty or practical benefit. Instead, it could unnecessarily restrict the Applicant's ability to make appropriate revisions to the staging programme where these are identified shortly before commencement of the relevant stage.
Schedule 3 Requirement 4: broaden consultation, require written agreements, and record amendments	REP1-161	Partially picked up	It is helpful that the Applicant confirmed Requirement 1(2) applies to ensure written agreement is required. The other suggested amendments should be made, as references in other documents or other parts of the dDCO do not address the points raised. Revision C update: Requirement 4 has been amended (Ref 33 of the Schedule of Changes) so that (i) consultation with the "relevant highway authority" is required for the construction traffic management plan; (ii) "in consultation with" has been replaced by "following consultation with" (a clarification that the relevant planning authority makes the decision following consultation rather than the consultee); and (iii) the requirement to carry out works in accordance with the approved plans now applies to all stages of the	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that **7.2 Outline Code of Construction Practice (Revision G**) and its Appendices includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the **3.1 Draft DCO [Revision G]**.

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
			authorised development (rather than just construction works), thereby better securing commitments and mitigation measures. These changes go some way toward broadening consultation and tightening procedure but do not create a CEMP, do not capture all of ECC's requested amendments and do not specifically secure ECC's point on recording amendments. Revision E update: Requirement 4 remains as at Revision C in this respect. No Construction Environmental Management Plan, Noise and Vibration Management Plan or Dust Management Plan has been added to Article 2 or Requirement 4 in Revision E, and the outline Code of Construction Practice remains the only vehicle. ECC's substantive point – and the related intra-project cumulative effects point now raised by the ExA at R17 Q1(b) – therefore remains outstanding.	Please refer to 8.30 Applicant's Response to Rule 17 Letter received 30 June 2026 [REP6-132].
Schedule 3 Requirement 5: archaeology drafting should better secure trenching/post-excavation programme and timings	REP1-161	Picked up	~~The Applicant has produced AS-090, with a separate section of the dDCO produced for discussion purposes only, which proposes new drafting that effectively adopts ECC's proposed new wording, but objects to the amendment to requirement 5(5).~~ Revision E update: Substantially picked up. Requirement 5 has been restructured in Revision E to secure a written scheme of investigation for evaluation works, preservation in situ management plans, a site-specific post-excavation assessment, an archaeological updated project design and archive deposition – broadly adopting the AS-090 drafting. Commentary raised within ECC Deadline 6 Letter.	Please refer to the Applicant's response to the ECC/Thurrock commentary on Requirement 5 in the main body of this document above.
Schedule 3 Requirement 6: design/layout drafting should give the host authority stronger control over departures from "general accordance"	REP1-161	Not picked up	The need for the proposed changes is not countered by ensuring flexible design or by the ES having considered the limits of deviation (REP2-030 pg 164).	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that the wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft DCO [Revision G]**. As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				effects are acceptable within the terms of **3.1 Draft DCO [Revision G]**.
Schedule 3 Requirement 7: no working on Sundays/bank holidays; change "HGV deliveries" to "HGV movements"; add communication/engagement controls	REP1-161	Not picked up	Requirement 7 still permits Sunday/bank holiday working in some cases and does not adopt ECC's broader wording changes.	Please refer to the Applicant's responses to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**.
Schedule 3 Requirement 7 Construction: no working on Sundays/bank holidays; change "HGV deliveries" to "HGV movements"; add communication/engagement controls	REP1-161 Note seven other LIRs rais concerns with this requirement	Not picked up	The Applicant addresses this requirement in REP2- 030 from paragraph 3.18.17ff. On the hours, the Applicant's response is that they give a maximum, which will not be used. That is not a good reason to allow them always to be used. The communication/engagement controls in the Outline Code of Construction Practice could be cross-referred to in the requirement. The control of HGV movements by the Outline Code of Construction Practice does not obviously answer the recommendation to amend "HGV deliveries" to "HGV movements".	Please refer to the Applicant's responses to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**.
Schedule 3 Requirement 7, remove "percussive" from piling works outside of specified hours	REP1-161	Not yet picked up	The Applicant has indicated it is considering this request and will provide a response at a future deadline (paragraph 3.18.29).	Please refer to the Applicant's responses to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**.
Schedule 3 Requirement 7(4): variety of detailed drafting suggestions	REP1-161	Not picked up	No clear reasons given for refusing to make the amendments.	Please refer to the Applicant's responses to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**.
Schedule 3 Requirement 9: five year management for replacement planting outside of Environmental Areas	REP1-161	Not picked up	A longer period is justified, despite the Applicant's commitment to the five year period being adaptive (though no drafting to capture this is proposed). These issues are addressed in detail in ECC's Deadline 3 Response.	The Applicant maintains the position that a five-year aftercare period for replacement planting (outside Environmental Areas) is considered sufficient to ensure successful planting establishment across the Project. The Applicant provided a comprehensive justification for the aftercare period for at Item No. 5.1q in **8.5.12 Applicant's Written Summary of Oral**

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118].
Schedule 3 Requirement 10: clarity around the phrase "former use" and reinstatement of land within 10m of underground cables	REP1-161	Partially picked up in Revision C ("former use" point only)	The Applicant will consider ECC's proposed drafting in the revision of the draft Development Consent Order to be submitted at Deadline 3. Revision C update: Requirement 10 has been amended (Ref 36 of the Schedule of Changes) to replace the phrase "former use" with "former condition", picking up ECC's drafting concern about the meaning of that phrase. ECC's separate point on reinstatement of land within 10 metres of underground cables (Requirement 10(2)) has not however been amended in Revision C. Revision E update: Position unchanged in Revision E. Requirement 10 retains 'former condition', but Requirement 10(2) still disapplies the reinstatement obligation for land above or within 10 metres of underground cables installed as part of the authorised development. ECC's reinstatement point therefore remains outstanding.	The presence of underground cables affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanket requirement to reinstate land suitable for its former condition should not apply to land within 10 m of the cables.
Schedule 3 Requirement 13 - strengthen decommissioning/restoration detail	REP1-161	Not picked up	No clarity given. Revision C update: Requirement 13 has been amended (Ref 38 of the Schedule of Changes) only to replace "in consultation with" the relevant highway authority with "following consultation with". The Applicant has not strengthened the substantive decommissioning/restoration detail. ECC's point therefore remains.	Please refer to the Applicant's response to DCO 2.S12 in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**.
Schedule 3: a design requirement should be added so the EACN/substation design aligns with the Joint Substations Design Guide and the same approach/colour palette as North Falls and Five Estuaries	REP2-036 §3.36	Not picked up	Requirements 11 and 12 could include an express commitment to the Joint Substations Design Guide or co-ordination with the neighbouring projects. Revision C update: a new sub-paragraph (2) has been added to Requirement 11 (Ref 37 of the Schedule of Changes) requiring the external colour of the gas insulated switchgear building and gas insulated hall annexe forming part of Work No. 18(b) to be maintained in accordance with details approved by the relevant planning authority (in response to ExA Question DCO 1.S3). This is a useful but limited step. ECC's point on alignment with the Joint Substations Design Guide and co-ordination with North Falls and Five Estuaries has not been picked up.	The Applicant included a new design principle on Substation Design Co-ordination in the **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP5-167]** submitted at Deadline 5. This design principle provides assurance that key relevant management plans will remain coordinated as they are developed, reflecting the co-location of the substations and the need for aligned plans and documentation. The updated DASSI [REP5-167] also includes a commitment to have regard to the conclusions of the Joint Substation

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				Design Guide (Version 01: January 2026). The DASSI is a certified document under Schedule 19 of **3.1 Development Consent Order [Revision G]**. Requirement 12 sub-part (1) also requires any permanent building forming part of the authorised development must be in general accordance with the design approach for site specific infrastructure. This means the Applicant will need to demonstrate the permanent buildings at the EACN will have regard to the design principles and requirements set out in the DASSI when seeking approval to discharge Requirement 12. Furthermore, Requirement 12 sub-part (2) requires the Applicant to undertake the design review process described in the design approach for site specific infrastructure prior to approval by the relevant planning authority. The DASSI recognises that to ensure a co-ordinated approach, project representatives of the North Falls OWF and Five Estuaries OWF have agreed to participate in the Design Review. It would therefore be unnecessary and unreasonable to include an express commitment to the Joint Substations Design Guide or co-ordination with the neighbouring projects and co-ordination with North Falls and Five Estuaries under Requirement 12. The Applicant's view is that the DASSI and the drafting of the existing Requirement 12 represents the most appropriate vehicle through which to take account of the particular matters raised by ECC.
Schedule 3: Add further requirements for Developer's Forum / similar implementation governance	REP1-161 Also raised by South Norfolk DC; Tendring DC	Not yet picked up	The Applicant has committed to joining and engaging with the Developer's Forum but has not yet proposed a new requirement.	The Applicant has committed in **7.3 Outline Construction Traffic Management Plan [Revision F]** to join and actively engage with a Developers

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
	& Colchester CC			Forum established by Essex County Council, subject to agreement of suitable terms of reference, to support ongoing coordination between major developments. The Applicant considers that the inclusion of this commitment within the Outline CTMP provides an appropriate and robust mechanism for securing engagement with the Developer's Forum and therefore a separate requirement is not necessary.
Schedule 3: Add Employment, Education, Skills Strategy or an Employment and Skills Fund (now Requirement 15)	REP1-161 & REP2-036	Partially picked up	The Applicant has committed to preparing and submitting an Employment and Skills Plan and will consider the drafting of this requirement and add the wording into the Draft DCO in due course. Revision E update: Now partially picked up. Revision E adds Requirement 15 (Employment and Skills Plan) and lists the Outline Employment and Skills Plan (document 8.13) as a certified document. However, Requirement 15 requires the ESP only to be submitted (to the relevant county planning authority and Thurrock Council), not approved, and applies a 'general accordance' test with no measurable secured commitments. This is not sufficient. The relevant county planning authority and Thurrock Council should approve the ESP. The outline ESP should contain secured, measurable commitments (apprenticeships, % local labour, SME/supply-chain engagement) responsive to R17 Q2(a).	Please refer to the Applicant's response to this point in REP6-147 (Essex County Council) in this document.
Schedule 3: Add Supply Chain Strategy requirement	REP1-161	Not picked up	The Applicant has referred to its delivery partner, the Great Grid Partnership (REP2-030 paragraph 3.18.56), but has not engaged on the need for a Supply chain strategy or a new requirement.	Please refer to the Applicant's response to the Employment and Skills Plan above.
Schedule 3: Add health and wellbeing, and mental health, mitigation plans/strategies / inclusive communication related requirements	REP1-161 Also raised by Tendring DC	Not picked up	The Applicant effectively contends that no health and wellbeing significant effects are identified in the ES so no requirement(s) are needed. ECC contends for the reasons in the LIR that the current management plans are deficient and that mitigation plans are required.	Please refer to the Applicant's responses in **5.9.3 Statement of Common Ground - Essex County Council [Revision F]**. The Applicant's position remains unchanged that mitigation measures for health and wellbeing will be secured via Requirement 4 (management plans) of **3.1 Draft DCO [Revision G]**, and there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental**

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				Statement Chapter 10 – Health and Wellbeing [Revision C]. The Applicant considers that these matters fall outside the development consent process and are not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO.
Schedule 3: the Drainage Strategy (REP1-072) has been submitted. It should be secured in the dDCO, and the outline document may need further work before it is suitable	REP2-036	Not yet picked up	May fit in Schedule 3 or in Schedule 16 Part 3	The Applicant submitted an update of **8.2 Drainage Strategy [REP4-186]** at Deadline 4 and again at Deadline 6 **[REP6-095]**. The Applicant acknowledges that the level of detail of **8.2 Drainage Strategy [Revision C]** which Essex County Council would like to see is not available at this stage of the project. The Applicant is committed to providing this detail at the detailed design stage. This is secured by commitment GG22 within **7.2 Outline Code of Construction Practice [Revision G]**.
Schedule 4 Discharge of requirements: extend determination period from 28 to 56 days Paragraph 1(1)(b): period should run from day after receipt by the authority Paragraph 2(2): at least seven business days Paragraph 2(3): ten business days and revised backstop	REP1-161	Not picked up	There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better.	Please refer to the Applicant's responses on timings set out above under Article 11(3).
Schedule 4 notification of consultees	REP1-161	Picked up	~~The Applicant will consider the point and will provide an update at Deadline 3.~~ Revision E update: Now picked up. Revision E introduces a defined 'requirement consultee' and, in Schedule 4, requires the undertaker to copy any discharge application to the relevant requirement consultee and requires the relevant authority to issue the consultation to that consultee within 5 business days. This substantially addresses ECC's notification point.	No response required.
Schedule 4 paragraph 3(b) Fees: extend determination/refund periods to 42 days, clarify 20% retention and index-linking of fees	REP1-161	Not picked up	There is a clear difference of view between ECC and the Applicant on various time periods being extended, based on ECC's experience with other DCOs. The ExA will need to take a view on which approach is better. Revision C update: Schedule 4 paragraph 3 has been amended to remove references to "discharging" authority following deletion of that defined term. ECC's substantive points on extending periods to 42 days, 20% retention and index-linking of fees are not addressed.	Please refer to the Applicant's response to Essex County Council's comments on DCO 2.S13 in **8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]** in relation to index-linking of fees. In terms of fee retentions, and following discussions with ECC, the Applicant has amended the Draft DCO at Deadline 6 **(3.1. Draft DCO [REP6-030])** to provide that where an application is rejected as invalid, the

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
				relevant authority may retain the fee and credit it against a future application to discharge a requirement.
Schedule 16 Part 3: paras 3(1)(a) and 3(6)	REP1-161	Not yet picked up	The Applicant is considering whether the proposed drafting changes to Part 3 of Schedule 16 (protective provisions for the protection of drainage and flood authorities) can be included in the draft Development Consent Order at Deadline 3. Revision C update: notwithstanding the Applicant's indication that it would consider this for Deadline 3, no amendments to Schedule 16 Part 3 have been made in Revision C. The Schedule of Changes lists no Revision C amendments to Part 3. ECC's point therefore remains unaddressed.	The Applicant provided updated protective provisions to ECC on 3 July 2026 for consideration. The Applicant is yet to receive a response.
Schedule 16 Part 4: protection of highways authorities	REP1-161, also REP2-036	Agreement to move to a Framework Highways Agreement	REP2-030 pg 168: The Applicant understood that the highways authorities were seeking a joint Framework Agreement. The Applicant shared a draft of this agreement in the week commencing 23 February 2026 (along with updated Protective Provisions to reflect ECC's comments in the LIR). In the absence of a Framework Agreement, the Applicant is considering the comments raised by the Council. REP2-036 §3.8: ECC confirmed its preferred approach it to have a Framework Highways Agreement rather than rely on Protective Provisions.	No response required.
Schedule 19 / certification: the dDCO should secure that certified documents remain readily available to host authorities during discharge of requirements	REP1-161	Not picked up	The fact that the documents to be certified will be available on the PINS website (REP2-030 pg 170) does not answer the need for the dDCO to secure this.	Article 60(5) of the **3.1 Draft DCO [Revision G]** already requires the Applicant to make the certified documents available in electronic form for inspection by members of the public.
Outline Code of Construction Practice / Requirement 4: add an express intra-project cumulative effects mitigation commitment (equivalent to the Sea Link outline CoCP commitment GG40), securing coordination of concurrent works across parts and stages that affect a common receptor, and secure it through Requirement 4.	R17 (30-06- 26) Q1(b); ExA	New matter arising – not in dDCO	The Revision E dDCO contains no reference to cumulative effects and no concurrency / coordination mechanism. The commitment should be added to the outline Code of Construction Practice (document 7.2) and secured via Requirement 4. This dovetails with the Requirement 3 point above: because approval of the stages scheme is not required, nothing compels assessment of the combined effect of concurrent activities across stages.	Please refer to the Applicant's comments on this point in **8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132]**.
Provision of as-built details to relevant local authorities, especially for underground cable corridors.	R17 (30-06- 26) Q1(a); ExA	New matter arising – not in dDCO	The ExA notes that other DCOs secure the provision of as-built details to relevant local authorities, especially in relation to underground cable corridors. No equivalent	Please refer to the Applicant's comments on this point in **8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132]**.

ECC recommendation	Source	Status in current draft	Where picked up / where it should be added	Applicant's Response
			requirement appears in Revision E. A new Schedule 3 requirement should be added.	
Requirement 15 (Employment and Skills Plan): secure approval (not mere submission) of the ESP, with measurable local labour / apprenticeship / supply-chain commitments, and address supply- chain capacity given the other NSIPs in the vicinity.				Please refer to the Applicant's response to Q2(b) socio-economic matters deferred from Issue Specific Hearing 4 in **8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132]**.

Appendix E. Applicant's Response to Pylons East Anglia (PEA)

nationalgrid

Appendix E
Applicant's Response to Pylons East Anglia (PEA)

E.1 Introduction

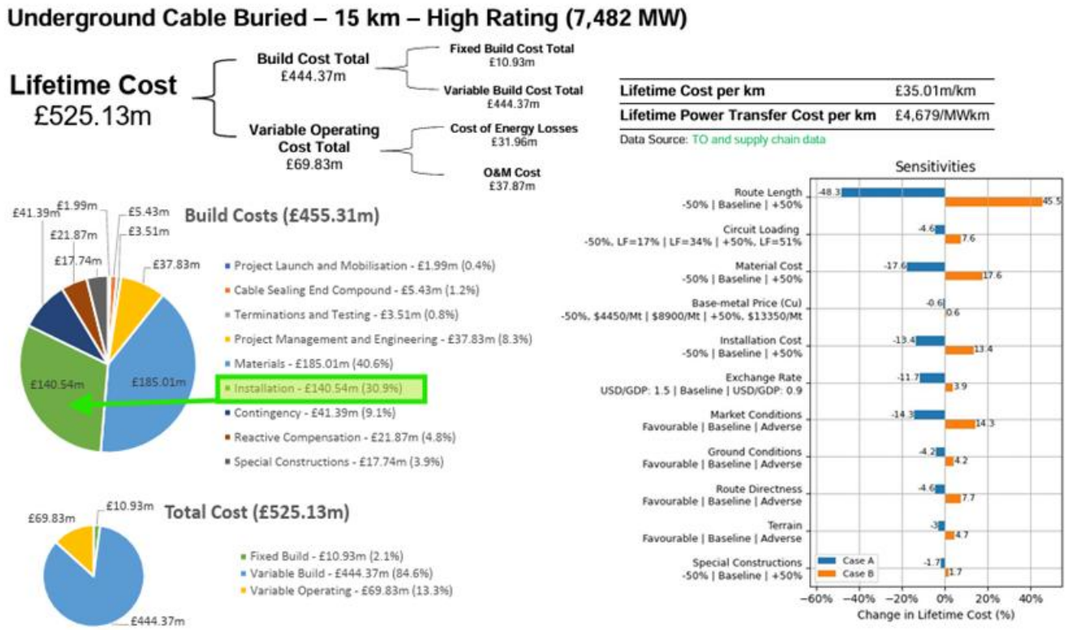
E.1.1 This Appendix summarises the Applicant's responses to the Deadline 6 submission from Pylons East Anglia (PEA) **[REP6-229]**. The Applicant has reviewed the submission and has identified that some of the points raised are similar to or extensions of matters previously raised by PEA and responded to by the Applicant at earlier deadlines. Therefore, in some instances the Applicant has sought to summarise points in this submission and respond in a proportionate and appropriate manner, with reference to its earlier responses and maintained position.

E.2 Applicant's Response to PEA Deadline 6 Submission

Table E.1 Applicant's Responses to Deadline 6 Submission from Pylons East Anglia **[REP6-229]**

Section	Matter	NG Response
Alternatives	With new evidence from the Government, in two reports, we ask the Panel to look closely at the evidence that is, and is not, in front of them about the project and its alternatives. There is still no breakdown of the project costs from the Applicant, despite requests for this from the outset, in 2022. Thus, we do not know if fair comparisons are being made between alternatives. We believe that our own Treasury Book costings provide a good starting point for discussions, but that the Applicant should be transparent. Below are our updated costs based on the new reports, and we set out our workings and analysis in Appendix A: *[Applicant note: table has not been reproduced, see original REP6-229]* The new reports back up the evidence that we have been submitting to the Applicant for several years, and, more recently to the ExA: • HVDC is viable over long distances (+120km), • HVDC undergrounding is cheaper and less damaging than AC undergrounding, and has many technical benefits. • Cable ploughing offers many benefits over cut and cover, and also potentially over the installation of OHLs. The additional costs associated with cut and cover are simply passed on. This means that in the Dedham Vale, for example, National Grid has chosen cut and cover, even though the extra costs will be paid by bill payers. Benefits of cable ploughing set out in the reports: – Lower labour costs: A faster process, from planning through to construction, reduces labour costs. – Faster planning and approval: The method can reduce the time required for planning approvals and preparatory work. – Reduced environmental impact: Eliminates or minimises spoil removal and damage to the ground, leading to lower carbon impact from civil works. – Fuel efficiency: Diesel consumption is significantly lower—claims of 58 L per km per slit, whereas open trench methods could use 10–15 times more.	The Applicant has provided a significant number of responses around these topics and PEA continues to assert positions without responding to evidence supplied at previous deadlines. The response below is consistent with our documentation and previous responses. **HVDC and HVDC Costings and Cable Ploughing** The Applicant has set out the relative costs of meeting the Project need case by different technologies, including onshore HVDC, within its response to **CA1.19 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].** This is the appropriate comparison to make as costing any other scheme, such as that proposed by the respondent that does not meet the need case, would not be taken forward as it does not fulfil the necessary connection requirement. The above responses set out differences between offshore and onshore HVDC cabling. The Applicant utilises cable ploughing offshore extensively for the evident reason set out below. The issues associated with onshore HVDC cables apply to AC onshore cables along with achieving the high thermal capacity which is required by these cables. It should also not be assumed that cable ploughing resolves all issues as numerous utilities pipes and cables need to be crossed along with multiple hedgerows and other features along with the challenges of installing each cable at greater separation than is achieved in trenching. Our recent cost updates have shown for 25/26 price base that onshore HVDC cable costs 1.6x more than offshore cabling for the following reasons: Offshore HVDC • Up to 100km of single cable or 50km of bi-pole pair cables can be carried on an ocean-going vessel per laying campaign. • Jointing of the cables is only required every 100km for single cable lay or 2 joints every 50km for cable pair. • Cables ploughed uninterrupted for long distances without obstruction on cable crossings lower than on land. Onshore HVDC and AC underground cables • Only circa 1km of single cable can be delivered within road limitation, weight and height for road transport. • Jointing of the cables is required every 1km for every cable. • Cables buried ploughed only 1km requiring joint pit every 1km. Multiple, road, rail, river, hedgerow, ditch boundaries require management.

Section	Matter	NG Response
	– Increased construction speed: Faster installation (up to 1.5 km/day, with potential for 4.5 km/day using three ploughs) reduces labour costs. – Minimal ground damage: Damage to the ground and reinstatement required is much less than with cut-and-cover. – Easement reduction: Especially when no sand backfill is used, the easement can be limited to the width of the plough, reducing land disruption. – Potential cost parity with overhead lines: It is claimed (Thomas 2024) that cable ploughing could be similar in cost to overhead lines (OHL). • Underground cables have lower failure rates than overhead cables and are protected from extreme weather (and terrorist attacks). • High Temperature Low Sag conductors offer huge capacity advantages. We ask again, therefore, why the Applicant is not looking to upgrade the existing grid using these high capacity conductors, at a much lower cost and at far lower community and environmental harm than building new transmission lines. Alternatively, why is the Applicant not looking to use these conductors on the N2T project. We note that neither Government report includes a Treasury Green Book analysis. This matters, because the externalities (natural capital impact and socio-economic impact) have not been quantified, and therefore the costs set out are for construction only and therefore the adverse impacts of OHLs and benefits of HVDC undergrounding have not been included in the cost comparisons provided. What these reports show us is that there are better ways of doing things and, these should have been considered by the Applicant.	Due to the size of both HVDC and AC cables that the Applicant uses onshore, there is always a requirement for jointing every kilometre, and achieving thermal ratings makes installation methods critical to delivering capacity. The Applicant's proposed method ensures delivery of assets that meet the need requirements as alternatives do not address the deficiencies below. The Applicant has identified the following issues associated with cable ploughing that need to be considered and are not addressed in detail within the Ramboll report, meaning the respondents' points do not align with the following identified deficiencies: On the use of cable ploughing for the installation of both AC 400kV Cables and HVDC 525kV Cables the following issues have been identified: • The size of the 400kV AC and 525kV HVDC cable drums would be unchanged. • For AC and HVDC, circa every 1km for a joint bay would need to be created to join cables together. • A haul road would still be required to get the cable to the installation section, as only circa 1km of a single cable can be transported on a cable drum. • Obstacles such as roads, railways, rivers, protected woodland and any other feature in the landscape would still require other installation techniques. • Techniques for deploying thermal backfill as part of ploughing process need to be tested to ensure cable ratings can be maintained. The circuit rating of 3,465MW or 5000A is the highest 400kV IEC rating circuits operating worldwide. • Thermal separation between the cables phases in the trench system cannot be maintained with ploughing so cables need to be spread wider. • There will be a need for pre-ploughing or ripping hard ground. • It cannot be used if the area where the topography is largely rock, especially areas of granite rock with no substrate soil. Many of the issues listed above have not been tested or demonstrated at scale. Circuits achieving 5000A have some of the hardest thermal management issues proven with existing installation and not in ploughed installations. **Cost** Please refer to Pages 33 – 49 **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** which sets out the applicants Alternatives considered. The analysis set out within these documents does not change regardless of cable ploughing which can only affect in proportion the installation cost of HVDC and AC cables. Please refer to the extract below 'Underground Cable Buried -15km – High Rating cost' from page 56 of the "A Comparison of Electricity Transmission Technologies; Costs and Characteristics" an independent report by Mott MacDonald in conjunction with the IET (the IET report). This clearly shows installation costs only make up 1/3 of the overall cost of cables which includes all the costs of cable jointing, cable delivery etc, which are still required with cable ploughing. Therefore, cable ploughing can only have a limited impact in the installation cost element only i.e. a limited reduction in this cost if identified limitations with cable ploughing set out below could be overcome.



The Applicant also notes the Department for Energy Security and Net Zero and Ramboll Report "RAF021/2425 Study of the Potential for Cost Reduction in Undergrounding Transmission Lines over Long Distances", makes the following statement on page ii of the Executive Summary:

"In the case of undergrounding AC circuits, the lowest cost method is cable ploughing in flat formation, however this remains over 5 times the build cost of double circuit overhead lines (OHL) on pylons for Medium capacity circuits"

Noting that the report does not refer to High Capacity circuits that Applicant is proposing which is at an even higher cost.

For HVDC where the report is comparing the cost of HVDC cable costs with HVDC overhead line cost (i.e. this section does not include the cost of convertor stations) the report states:

"The build cost for undergrounding DC using cable ploughing falls to around 2.5 times that of OHL for Low capacity circuits and 3.5 times for Medium capacity"

Again, the report does not state the higher costs of high capacity circuits, when high capacity circuits are required by the applicant as set out Pages 23 – 32 **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** which sets out the applicants Need Case and Timming.

Therefore, the Applicant's costs set out in Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, presents the costs, based on a transparent economic appraisal. These cost benchmark to the IET report and remain representative and aligned with the comments in the Ramboll report with respect to the differential in cost of Overhead Line and cable technology regardless of installation method. All of these references show that cost parity with Overhead Lines is not possible, as the cost of undergrounding even removing installation cost completely, is higher than the cost of Overhead Line, Ramboll stating 5 times higher in their report in comparison to medium capacity.

Section	Matter	NG Response
		The points on the Treasury Green Book are picked up later in this response document. **Transmission faults** Permanent failure rates of both overhead electrical equipment and underground electrical equipment at transmission level worldwide is statistically very low. This is because transmission pylons are designed to the highest wind and ice loadings combined, and are very structurally strong, more so than wood pole distribution circuits. It is true to say at distribution level undergrounding prevents weather related risk because wood poles and small conductors are more susceptible weather effects, but this is not true at transmission level. The more important issue is return to service (RTS) times for equipment. The RTS on overhead lines is hours to days, even for tower(s)/pylon(s) loss, temporary tower(s) can be erected quickly and the circuit can return to service. RTS on cables, cable joints and cable sealing ends are weeks to months. This is because the fault needs to be detected, excavated, delivery of spare cable, then specialised jointing work undertaken. In the case of sealing ends or joint bay failure, a complete civil re-build of joint bay or sealing end requires full construction work. Third party damage of overhead lines therefore is quickly repaired, whereas damage to cable infrastructure and civil infrastructure associated with cables takes longer to repair. **High Temperature Low Sag (HTLS) Conductors** The Applicant addressed the issues associated with the Use of High Temperature Low Sag Conductor (HTLS) and the fact the system has been upgraded to the highest 5000A capacity in the area in Issue Specific Hearing 1 and in more detail in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030],** the respondent has not commented on that evidence**.** Set out bellow is further detail on the consistent evaluation of HTLS technology. The Applicant has for 20 years used high temperature low sag (HTLS) conductors on routes where older pylons cannot achieve the highest ratings due to the limitations to the number of conductors that the tower can carry. The TS conductor is just one type of HTLS conductor from one manufacturer. The Applicant has been using the MATTHEW GZTACSR conductor for 20 years, for example, to maximise capacity on old routes. These HTLS conductors operate at higher temperatures (typically 150–250 °C), allowing greater losses without breaching sag limits. This reflects the constraints of older pylons, which must use smaller conductor bundles to remain within structural weight limits. The only way heat is generated in the conductor is through power losses so HTLS conductors are designed not to sag when they heat up from higher losses due to smaller conductors. Where newer, structurally stronger pylons are available, the highest network ratings can be achieved more efficiently using standard conductors operating below 90 °C. These lower-cost conductors are installed in bundles to minimise electrical losses while maximising capacity, delivering better value to consumers. Newer structures therefore achieve maximum ratings with standard conductors and lower losses. In East Anglia, both the existing and proposed network can reach the highest required ratings using these lower-loss, standard conductor solutions. As stated in paragraph 3.2.9 to 3.2.12 page 25, of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**: ‘*There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission, of 5,000 amperes, being the highest available equipment. This equates to:* • *A capacity on a single circuit of 3,465 megavolt-ampere (MVA)* • *A double circuit of 6,930 MVA* • *Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.*

Section	Matter	NG Response
		The current post-fault capacities of: • *EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW* • *EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.* *These circuits are operating within about 300 MW of the maximum capability, and therefore, new infrastructure is required to meet the deficits.* *Given the system indicated above is operating within 300 MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected, is set out in* ***8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]****:* • *LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings* • *TS Conductor (and other manufacturers) — High Temperature Low Sag (HTLS) conductor* • *Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors* • *Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation* • *EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages* • *Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.'* The Applicant made it clear the existing network cannot be enhanced further as it is maximised to the 5,000 A rating currently. Therefore, reconductoring in East Anglia has been maximised to 5,000 A rating; where reconductoring is being done on the Applicant's system it is to improve circuits to meet this maximum 5,000 A rating limitation. Where circuits are operating below this limit reconductoring is always considered, including using HTLS conductors where the pylons cannot meet the 5,000 A rating with standard conductors. The triple Araucaria conductor, which is a 700 mm2 conductor carried in a three-wire formation, operating at 75 °C, can meet the 5,000 A year round rating. Where the Applicant uses HTLS conductors in double formation with conductor sizes below 700 mm2, the resistivity of the conductor which is proportional to the total cross-sectional area of the conductor bundle increases. This means that 5,000 A cannot be achieved without conductor operating temperatures closer to 200 °C. This gives rise to higher system losses, which impact consumers. Therefore, using HTLS has to be a balance of system need, transmission infrastructure and cost to consumer. Where the system can accommodate the maximum 5,000 A rating with traditional conductors, they are chosen to minimise electrical losses while maximising capacity, delivering better value to consumers. As set out above the Applicant has provided a clear and detailed response, here and in previous submissions, on the use of conductor technologies and how they are best applied to meet the maximum 5000A circuit rating. This takes into account the best way to achieve the maximum possible 5000A circuit rating at the lowest possible electrical losses, delivering value to consumers and delivering a more efficient and operable transmission system for the future.
Needs Case	Our position set out in submissions remains: that the absolute capacity required has been over-estimated by the Applicant and that the timings for required delivery of new generation capacity are far too optimistic given demonstrable delays in the industry. There is not the great need for speed repeatedly pressed on the panel by the KC for the Applicant. This is simply bluster, and the NESO 2030 Clean Power report that sets out constraints costs contains clear inaccuracies/errors about constraint costs (as	Please refer to Pages 23 – 32 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** which sets out the Applicant's Need Case and Timing clearly. Section 3.2.30 page 29 of **[REP2-030]** concludes *"**Conclusion**: National Policy Statement (NPS) EN-1 identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Therefore, the timing and need for the Project set out Section 3 Needs Case pages 20-38 7.17 Strategic Options Backcheck and Review [APP-355] remains urgent within the requirements of*

Section	Matter	NG Response
	we have set out previously) and therefore cannot be relied on. While there is a national need to upgrade the transmission grid in East Anglia (the CNP/public-benefit angle much repeated by the Applicant's KC) this need can be met in a number of ways, and with time to get it right. The panel has seen in person the landscapes and natural habitats at risk, heard and read the impassioned submissions of residents and business owners, and read the evidence submitted about the widespread harms caused by the project. We and others have submitted evidence which demonstrates that the CNP exemptions are engaged. It is therefore imperative that the need case is understood, so that a project which causes enormous public harm is not wrongly approved.	*NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and the Applicant' obligations."*
Needs Case	The Applicant now states, in response to the Dedham Vale Society/PEA Ltd submission, that there is a boundary need of 8GW[2] (an increased need case since the outset of the project). This is to justify their purported need for 6GW of DC cabling. However, if this is the case, it raises two issues: i The project scope has therefore changed. ii The proposed solution (AC OHL 6.93GW) will not be sufficient to meet the new presented need. In fact, a DC solution would be closer to meeting the new need presented (remembering that DC is controllable and can be used to the full, while AC is not, and requires headroom, so cannot be fully utilised). It would also be more beneficial to use higher capacity conductors (such as TS Conductor) on overhead lines. Our understanding is therefore that the proposed solution cannot carry 6 GW or more continuously under normal operation, and requires spare capacity for contingency scenarios.	The Respondent indicates that the boundary requirements set out are new and have changes. There have been no changes since the documents were submitted for examination and the point in question was a change in needs case made 3 years ago in 2023 and documented at that time as set out in Paragraph 15.4.14, **page 124 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] stated:** '*Originally, the lowest cost offshore alternative option to meet the need was option Offshore 1 (Norwich Main to Tilbury) at 4000 MW with capital costs £2,882.2m and lifetime costs of £3,232m, in combination with SCD1/Sea Link or an alternative. However, this option no longer provides the required capacity of a minimum of 8,000MW across LE1 and EC5, since the updated contracted generation described in the needs case section of this report has increased. This option has been included in this report as it was considered when the contracted position allowed and disclosed previously. Option Offshore 1 is also suboptimal in technical terms relative to the optimal onshore combination of options (EAN 4 and EAN 2).*' As set out in **paragraph 3.2.10, page 25, of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**: '*The current post-fault capacities of:* • *EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW* • *EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.'* This shows the physical capacity across the boundaries is required to be greater than 6,000 MW (6 GW); therefore, the Applicant, as stated above in 2023 the quoted paragraph 15.4.14, could no longer in this case consider a 4,000 MW (4 GW) high voltage direct current (HVDC) solution as it no longer has the physical capacity to meet the need. The scope has not changed and the needs case set out from June 2025 **Section 3: Need Case page 20-38 7.17 Strategic Options Backcheck and Review [APP-355]** is the source for these capacities set out above. The AC solution has 6,930 MW of capacity which is 930MW or circa 1GW greater than the capacity of a 6GW HVDC solution. Therefore the AC solution provides circa 7GW of capacity compared with 6GW HVDC solution, and is therefore capable of carrying more power and better meeting the need of the project. For the EC5 Boundary the capacity is provided by the combination of Norwich to Tilbury (circa 7GW) and Sealink (2GW) which provide circa 9GW of boundary capacity. Controllability of HVDC does not increase the capacity, so the HVDC solution has less ability to meet the need. As addressed above using High Temperature Low Sag (HTLS) conductor does not assist here as the circuits are limited to the highest IEC 400kV rating of 5000A which can be achieved with standard conductor in this case. As stated in paragraph 3.2.9 to 3.2.12 page 25, of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**: '*There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission, of 5,000 amperes, being the highest available equipment. This equates to:*

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		• *A capacity on a single circuit of 3,465 megavolt-ampere (MVA)* • *A double circuit of 6,930 MVA* • *Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.*
Needs Case	We quote directly from the Eastern Green Link 3 & 4 Strategic Optioneering Report 2024[3]: "5.0.1 The largest capacity AC technology option that can be used on NGET's transmission system consists of two 3,465 MW transmission circuits that are supported on a single set of towers (6930 MW double circuit capacity). The largest HVDC capacity systems that can currently be accommodated on our transmission system are 2,000 MW HVDC cables. 5.0.2 Power flows on AC transmission system circuits cannot be controlled to the same extent as can be achieved using HVDC connections. This lower level of controllability can result in higher power flows particularly during transmission system fault conditions. Taking account of the potential for higher power flows that could be expected, therefore to provide the potential equivalent capacity, the AC option would need to consist of a high capacity (6,930MW) double circuit route to meet any high loading during fault conditions. 5.0.3 The required capacity HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option in this case. It is also recognised that delivery of an onshore solution with a long route length, carries much higher delivery risk than the HVDC reinforcement proposals (EGL3 and EGL4) that are currently being progressed. The use of overhead lines is not considered to be feasible because they cannot be delivered by the required 2030 timescale." We therefore contend that the project in front of the ExA (AC 6.93GW) can equally be delivered using 4GW HVDC cables, not 6GW. This, as we have previously stated, has cost and environmental benefits. If, as the Applicant now states, there is a greater need, then that would require an analysis of different solutions.	The Respondent states that the boundary requirements set out are new and have changes. There have been no changes since the documents were submitted for examination and the point in question was a change in needs case made 3 years ago in 2023 and documented at that time as set out in Paragraph 15.4.14, page 124 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** stated: '*Originally, the lowest cost offshore alternative option to meet the need was option Offshore 1 (Norwich Main to Tilbury) at 4000 MW with capital costs £2,882.2m and lifetime costs of £3,232m, in combination with SCD1/Sea Link or an alternative. However, this option no longer provides the required capacity of a minimum of 8,000MW across LE1 and EC5, since the updated contracted generation described in the needs case section of this report has increased. 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The (Eastern Green Link) EGL3 and EGL4 HVDC projects only required HVDC capacity of 4,000 MW (4 GW) in that case; however, if an alternating current (AC) solution were to replace that option over a distance of >600 km, the capability requirement would still be 4,000 MW (4 GW). However, due to the way AC circuits work in that case a larger capacity AC solution would be required to better share across the rest of the AC network. Therefore, the Applicant always compares 2 GW HVDC links (as in the Case with Sealink) and 4 GW HVDC links (as in the case for EGL3 and 4), with a minimum of a 6,380 MW AC alternative. In the case of the EGL3 and EGL4 the alternative set out on page F3 of Appendix F 'Eastern Green Link 3 (EGL3) and Eastern Green Link 4 (EGL4) - Strategic Options Report (SOR) May 2025' was over 768 km in length, which is over four times the length of the Applicant's proposal. These distance impacts are reflected in the EGL3 and 4 evaluation, using the same consistent appendix set out in Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, which is mirrored in the EGL3 and 4 documentations.

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		This is regardless of the capacity required as AC circuits form part of an overall AC network and will naturally share the power flow across the new circuit. This requires it to be considered as a suitable size to allow those flows to occur. However, in the case where more than the 6 GW physical capacity is required across a boundary to meet the need, then the physical capacity of both a HVDC and AC need to be 6 GW or greater to meet the need. For the Applicant's project this need for 6,000 MW (6 GW) of capacity is set out in Section 3: Need Case, pages 20–38, of **7.17 Strategic Options Backcheck and Review [APP-355]**.
D6 Bird collisions BIO 1.12	Summary of position so far: We note that at the Inception Meeting on 4th April 2022, the Inspectorate "queried whether surveys of birds and flight paths have been considered. The Applicant responded that these had not been conducted yet." This means that the choice of technology and route had been decided by the Applicant before understanding the potential impact on birds. This is a clear indication of predetermination. The Applicant finds no residual operational effect (in Table 8.24 of **ES Chapter 8 [AS-026]**, saying: "…collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is not significant". We disagree. The absence of specific surveys for wintering farmland birds by the Applicant because they "are not considered to be at risk of collision" (8.5.57 of ES Chapter 8 [AS-026]) is an unfounded decision. We have supplied copious evidence of large waterbirds, raptors, and waders (including IUCN globally Near Threatened Eurasian curlew and northern lapwing) feeding on farmland/traversing across the farmland on the N2T route, submitted as direct observations in the form of photos, or other forms of record, at varied locations. Further, we have supplied evidence, summarised in the Bird Collision Matrix, that birds of all species groups are at risk of mortality due to collision with overhead lines.	The Pylons East Anglia summary suggests that the route and technology selection process was determined prior to the commencement of bird surveys, but this is not the case. The respondent is correct that bird surveys had not been undertaken by April 2022; however, this does not mean that the initial scoping route corridor failed to consider potential impacts to bird flight paths. The initial scoping corridor took into consideration national and international designated sites for birds including Special Protection Areas (SPAs), Ramsar Sites and Sites of Special Scientific Interest (SSSI) and a route avoiding such sites was favoured. In addition, the preferred route was subsequently refined through an iterative route selection process, which was informed by the results of survey work including the results of bird surveys. With respect to bird collision risk, the Applicant acknowledges the comments provided by Pylons East Anglia and has reviewed their content. The Applicant does not have any further submissions to make regarding ExQ1 at this time and defers to its previous submissions on these questions; both its own responses **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and its comments on Pylons East Anglia's response to ExQ1 - **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** and **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202].**
D6 Bird collisions BIO 1.12	Our response to 8.4.13.16 We note that the Applicant has not disputed the fact that although they claimed to follow CIEEM guidance, there is no overhead power line guidance in that document. The Applicant should note that ScotNature says, "Once the preferred route has been chosen for a transmission power line, field surveys will be required to provide up-to-date information on bird distribution and activity, to assess the risk to birds and to inform any required mitigation." The 'comprehensive desk study' referred to by the Applicant is not sufficient, and nor are the 'vantage point' surveys, particularly as they showed 'no significant collision risk', which seems an unlikely conclusion given the known geese, egrets (great and little), great cormorant, mute swan, and various birds of prey, waders, and farmland birds (several of which are nationally Red Listed), recorded in both river valleys. Despite the Applicant noting that Natural England is in agreement on their approach to Functionally Linked Habitat, our observations along the route suggest that there is in fact a strong Functional Link to the coastal protected	The Applicant does not agree with Pylons East Anglia's characterisation of the assessment or the conclusion that additional surveys are required. The Applicant followed the CIEEM Guidelines for Ecological Impact Assessment throughout the impact assessment process. This guidance provides the overarching framework for ecological impact assessment rather than providing detailed guidance on power line collision methodology, or methodology for any other development type or ecological receptor. Specific guidance on survey approaches for protected species is provided in separate best practice documentation, which for the case of bird collision, is the NatureScot guidance as identified in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [Revision B]**. The Applicant does not agree that the desk study and survey effort undertaken is insufficent. The assessment incorporated an extensive programme of targeted field surveys, including wintering and passage bird surveys and vantage point surveys specifically designed to identify bird distribution, flight activity, commuting movements and collision risk. These surveys were undertaken at locations selected to capture areas where target species and flight movements were most likely to occur. Therefore, the conclusions within the Environmental Statement are considered robust. The Applicant also does not accept the suggestion that the absence of significant collision risk findings indicates a deficiency in the survey approach. The conclusions are based on the evidence gathered through the

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	habitats and large waterbodies. Those waterfowl our supporters have observed along the project route are seasonal or temporary, and there is considerable potential that they return to the coast diurnally or seasonally. It is widely known that there is a lack of data about coastal birds feeding inland. For this reason, the Applicant, when building a 50-metre high barrier stretching across East Anglia, should have taken extra care to carry out surveys that explicitly examine the movements of bird species between inland areas and coastal areas, but this daily shifts or seasonal/migratory movements. The absence of data does not automatically equate to an absence of birds (as indicated by our own observations). The precautionary principle is key in a project of such a huge scale and such a devastating potential impact. In one of the few studies of pink-footed geese feeding inland (in north Norfolk), by the British Trust for Ornithology, it was acknowledged that there is not enough evidence of the feeding habitats and movement behaviour of coastal birds, and that even the study itself was restricted in its conclusions due to lack of data. However, the study discovered that pink-footed geese regularly move far inland (even beyond the 20 km line which contained the main study results). There are a great many points along the N2T route where the pylons fall well within a 20km distance from the coastal SPA's, SACs and RAMSAR sites. The study concluded, "Further, there is a need for important agricultural feeding areas for geese and swans to be identified and protected or managed for the benefit of the internationally important concentrations of birds they support, complementing the protection provided to roosting birds through the existing suite of designated sites for this species." With a UNESCO bid[8] for the globally significant 'East Coast Flyway' under consideration, it is of paramount importance that an infrastructure project that could be designed to avoid harm to birds altogether, does not create a risk to the multitude of East Coast waterfowl, including the Arctic and continental European avian visitors, which may benefit from foraging habitats and resources in rural East Anglia's fields. Below we respond to the Applicant's comments about Fordham / Aldham, although we note that this is a mere microcosm of a pattern that is repeated along the route, and it should be taken as a case study that is likely representative of other locations. We are a community group and do not have the capacity to carry out formal surveys of our own. **Applicant's comment** / **PEA Ltd Response** With regards to the topography at Fordham / Aldham, the landscape is considered to comprise rolling hills rather than steep hills with exposed ridges. — We agree. In addition, the landscape contains many woodlands, copses and lines of trees, and the overhead line in this area is not considered to be exposed. — As previously stated, the overhead line throughout the Fordham Valley, across the Colne, and up the towards Aldham, as well as across the Roman	desk study, field surveys and collision risk assessment, including consideration of species present, abundance, flight behaviour, flight heights and use of the landscape. The assessment identified no significant collision risks requiring further mitigation beyond that already proposed. The Applicant has continued to provide comprehensive responses on collision risk, farmland birds, Pylons East Anglia sightings of birds along the route. No further development on these matters is presented within this matter from Pylons East Anglia, and as such, reference to the previous response is made to BIO 1.12 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074], 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** and **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**. A detailed assessment of functionally linked land (FLL) was undertaken as part of the **5.3 Habitat Regulations Assessment Report [APP-082].** This involved various stages of consultation with Natural England before the extent of FLL was agreed and an assessment as to the potential likely significant effects was completed. The conclusions in the final HRA report have also been agreed with Natural England. The Applicant does not agree that anecdotal observations are sufficient to outweigh the conclusions of the survey evidence and HRA process. As identified in **8.9.1 Applicant's Responses to First Written Questions [REP3-074], 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** and **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**, the Applicant has demonstrated that the vantage point survey effort was designed to target the passage and wintering period to record migratory behaviour and commuting behaviour between coastal areas and inland areas. In addition, a precautionary approach has been adopted by installing bird diverters (along with coloured spacers as an additional measure) at the River Waveney and Ardleigh Reservoir to reduce a collision risk that has been assessed as low and not significant. European Sites including Special Protection Areas (SPAs) and Ramsar Sites (Special Areas for Conservation are not designated for birds) with geese listed as qualifying features were mapped along with corresponding geese records to determine the distribution of these species. A survey scope along with Impact Risk Zones for geese was agreed with Natural England as outlined within the consultation section of the **5.3 Habitat Regulations Assessment Report [APP-082].** With regards to pink-footed geese, very few records (total of 3 records) were returned as part of the desk study while during survey work, observations were limited to a single record of two birds at Survey Location 5 (River Gipping) and a single observation of seven birds at Survey Location 21 (East Tilbury). Therefore, no significant records from the desk study or survey effort exist for this species along the Norwich to Tilbury route, and this species is not considered to be adversely impacted by the Project. The Applicant therefore does not agree that the Project presents an unacceptable risk to SPA-associated birds or migratory waterfowl. As stated in previous responses, The East Coast Flyway is largely defined by designated sites of international importance along the east coast including SPAs and Ramsar Sites. A Habitat Regulations Assessment (**5.3 Habitat Regulations Assessment Report [APP-082]**) has been completed to determine whether there would be an effect on the integrity of these sites, and it was concluded the integrity would not be affected. This conclusion has been agreed with Natural England. With regards to the area around Fordham / Aldham, the Applicant has reviewed the Pylons East Anglia's response on the landscape in the area and maintains that this location was appropriately surveyed through vantage point surveys (Survey Location 12) covering the river corridor and surrounding fields, which were considered most suitable for target bird species (those that are most at risk of collision such as wetland/waterbirds). The surveys were designed to assess commuting corridors between feeding and roosting areas. Subsequently collision risk has been assessed as low and not significant in an Ecological Impact Assessment context. This is based on an assessment of

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		River nature corridor is in fact very exposed.	
	Vantage point surveys have been completed along the river corridor in this area and did not identify this as in area of collision concern.	This is not an adequate response. It conveys very little and is extremely ambiguous.	
	The wooded landscape is less suitable for the Target Bird Species that are of risk of collision such as geese, which prefer large, open, flat landscapes for feeding and roosting.	This is a landscape of water-meadows, hay fields and arable land. There are several waterbodies in the vicinity of the route: the Fordham reservoirs (two adjacent to the route and one on the airfield) and a very large lake off Vernon's Road, Chappel, which hosts hundreds of geese and swans in winter and smaller numbers in summer, only 2 km from the Ford Street pylons. Our previous submissions, including at registration have included numerous observations of waterfowl in the area or passing daily across the area to and from the direction of the coast in the winter. These did not include the egret now regularly spotted on the Colne at Ford Street, and we note again the great cormorants regularly seen at the Vernon's Road lake. We note again that birds of prey such as common kestrel, common buzzard, red kites and barn owl are abundant in the area (as they are along much of the route), which do not appear to have been observed by the Applicant. And we remind the Applicant that the Bird Collision Matrix shows that small farmland birds are also at risk from collisions with power lines.	
	NatureScot guidance also suggests birds react to obvious obstacles such as trees early, and therefore, although the trees are not of equal or greater height than the pylons, flight heights will likely be above collision risk height or close to this, so flight adjustments to ensure avoidance are not extreme	NatureScot's precise words are: "Running power lines along existing linear elements of equal or greater height (e.g. cliffs or rows of trees) may reduce collision risk, as birds will react earlier to fly over the more obvious obstacle." It will be quite apparent that there are no elements of an equal or greater height in the Fordham/Colne Valley/Aldham area, or along the rest	

the species present, numbers of birds, flight heights and behaviour. The distribution of birds in the wider area (within 2 km of the Order Limits) have also been mapped as part of a comprehensive desk study in which records were obtained from the British Trust for Ornithology (BTO), Royal Society for the Protection of Birds (RSPB) and local records centres. In summary, a robust picture of bird movements, distribution and behaviour has been obtained through the desk study and survey effort on which these conclusions have been based. The Applicant does not agree that the presence of local waterbodies or occasional observations of waterfowl, raptors or other bird species undermines that conclusion.

Sightings of birds of prey (including common kestrel, common buzzard, red kite and barn owl) are included in both the wintering (**6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [Revision B]**) and breeding (**6.8.A7 ES Appendix 8.7: Breeding Bird Report [Revision C]**) bird reports. The breeding bird report also contains a confidential Appendix on the breeding distribution of both red kite and barn owl which is necessary as these are both Schedule 1 listed species and as such are sensitive records.

The Applicant has provided comprehensive responses on Pylons East Anglia sightings of birds along the route, as well as the Bird Collision Matrix and the need for monitoring. No further development on these matters is presented within this matter from Pylons East Anglia, and as such, reference to the previous response is made to BIO 1.12 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074], 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** and **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202].**

Accordingly, the Applicant remains satisfied that it has followed best practice guidance to complete a robust evidence-based assessment which has been supported by targeted field surveys and supporting desk-study information. Notwithstanding the absence of significant predicted effects, the Applicant has adopted a precautionary approach through the provision of bird diverters and coloured spacers at identified locations. The Applicant considers this to be appropriate and proportionate mitigation.

In addition, the **5.3 Habitat Regulations Assessment Report [APP-082]** has demonstrated no effect on the integrity of internationally important sites (SPAs, SACs and Ramsar Sites) which has been agreed with Natural England. No further assessment or monitoring is considered necessary or justified.

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		of the route. A mature oak grows to a maximum of 30 m and Aldham Church spire is 30 m high. As the Applicant notes above, there are no cliffs in the Colne Valley, or along the route. Ironically, the Colne Valley is an area which will see particularly significant tree loss for the Project, with the result that the area will become more open, putting birds at arguably greater risk. Even if birds do adapt when there are trees, power lines are less visible than trees, and are particularly obscured and undetectable at dawn and dusk, during fog, and at night time. NatureScot also says, in the pre-survey conditions, “Known roosting and feeding areas, known flight paths between these areas or any known flight paths used by migrating birds. For example, placing a power line between fields used by grazing geese and a roost loch could cause mortality of commuting birds colliding with the wires, or potentially create a barrier effect leading to reduced use of the site. The problem is that the Applicant did not know about many of the roosting and feeding areas along the route because it did not carry out the relevant surveys, and was disinterested in residents’ submissions during the four years of consultations.	
	There remains considerable and unacceptable risk that the Applicant has significantly understated the mortality and behavioural/distribution change risk to birds of multiple species groups from the Norwich to Tilbury overhead lines. Inland movements of SPA-associated birds have not been adequately assessed. Substantial uncertainty remains, and the precautionary principle requires further investigation before consent can be granted. Additional surveys are required the bird collision data should be reviewed by an independent. Post construction monitoring must be built into the DCO such that additional diverters can be fitted		

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HW 1.1 and GEN 1.26 Health & Wellbeing	We disagree with the Applicant as follows: • We believe that the project does present an unacceptable risk to human health • We do not agree that there are no significant impacts identified in relation to mental health and well-being either during construction or operation. Those significant impacts already exist, as identified by our own survey, which itself is likely to significantly understate the impacts. • The baseline data used by the Applicant is desktop-based, generic and high-level, and does not reflect the reality If we, a community group with very limited resources, have been able to carry out regular surveys that identify and highlight real health and well-being issues on the ground, why has the Applicant not made the effort to do so? • The applicant claims inclusive and transparent engagement. Quite apart from the fact that it has been shown through our submissions, a great many other submissions, and CAH and OFH statements that engagement has been neither inclusive nor transparent, it is clear that whatever the Applicant thinks it has done has not been successful. For example, the Applicant claims that it has responded to fears about health related to the project yet our most recent survey, more than four years after the first consultation in 2022 indicates that respondents remain concerned about EMF and implanted medical devices. • The Applicant claims that its public information events were designed to capture information and feedback, yet one of the most common complaints that Pylons East Anglia received about these events was that it was very difficult to give feedback and that what residents told staff at the events was not capture in any way. The vast majority of conversations with the Applicant's representatives at these events went uncaptured. We also remind you of our 'Deficiencies' submission which highlighted numerous other issues with the consultation process. • Furthermore, the panel should be aware that the Pylons East Anglia team receives countless messages, emails and calls of despair, with residents at their wits end, not knowing what to do, telling us about their own physical or mental health, or the health of a loved one, due to the N2T project. We are unable to share these, due to the private and personal nature, but, quite apart from the survey results we have submitted, we are acutely aware of the terrible impact this project is having on people in the region. We remain of the view that the Applicant chooses not to understand the very significant, widespread physical and mental harms caused by the project, and the responses given do not persuade us that people with Protected Characteristics have been identified or, if they have, been taken into account.	The Applicant does not consider that the Project presents an unacceptable risk to human health, and appropriate mitigation has been incorporated where relevant. The assessment of impacts on health and wellbeing provided in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** has been completed in line with appropriate guidance (e.g. IEMA, WHIASU) and is both proportionate and robust for a Project of this nature and scale. No significant impacts have been identified on physical or mental health and wellbeing as a result of the construction or operation (and maintenance) phases of the Project. The assessment provided in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** acknowledges that community mental health and wellbeing can be impacted by, for example, changes to landscape and visual amenity, and assesses impacts during both the construction and operation phase. It is noted that impacts are likely to be experienced differentially by members of local communities according to factors such as where they live, or their outlook (those living in closest proximity to construction activities, or to Project infrastructure, may be more vulnerable to change). The Applicant is aware, through statutory and non-statutory consultation undertaken prior to submission of the DCO, as well as from representations made by Interested Parties throughout the course of Examination, of the strength of feeling from affected residents and concerns stemming from uncertainties surrounding the Project. Concerns raised at statutory and non-statutory consultation events relating to impacts on mental health and wellbeing are captured in **5.1 Consultation Report [Revision B].** The Applicant has sought to reduce potential effects on communities and residents through routeing and design and to reduce concern or uncertainty about the proposals through making timely design decisions and ongoing engagement. The Applicant has strengthened the approach to future communication and engagement, including through new commitments in **7.2 Outline Code of Construction Practice [Revision G]** relating to preparation of a detailed Communications Strategy. The Applicant is aware of specific circumstances relating to particular individuals with protected characteristics, and is pursuing engagement with these parties separately to ensure understanding of construction activities and potential areas of impact. The Applicant has sought to alleviate concerns regarding EMF and implanted medical devices, replying directly to issues raised via the project helpline, during the pre-application period and in response to questions raised throughout the examination period. Guidance around EMFs and medical impacts is clear with National Policy Statement EN-5 from the Government's competent authority on EMF and heart devices stating: *'2.9.58 The Department of Health and Social Care's Medicines and Healthcare Products Regulatory Agency does not consider that transmission line EMFs constitute a significant hazard to the operation of pacemakers.'* The Applicant is unaware of any reported instances of an overhead line interfering with a correctly fitted modern electronic implantable device such as a pacemaker or ICD. Further details of EMF and medical devices is provided **Section 2.10 in 7.8 Electric and Magnetic field Compliance Report [REP3-034].** The Applicant will continue to engage with anyone who has concerns, to provide reassurance that there will be no EMF impact to medical devices from the proposed Project.
LUS 1.2 Acid Sulphate Soils	We note that document 5.9.15, SOCG with the Environment Agency, has no mention of acid sulphate soils. We reaffirm our concerns set out previously, including at Deadline 5, reminding the panel that acid sulphate soils are known as the world's nastiest soils because of the environmental risk and risk to human health that they pose. Summary of the position so far:	The Outline Soil Resource Plan (Appendix C of **7.2 Outline Code of Construction Practice [Revision D]**) has been updated, detailing the approach to further pre-construction surveys. Further surveys will be undertaken in relation to potentially acid sulphate soils, where sampling design and methods will be agreed in consultation with Natural England. Investigations will be undertaken ensuring that there is sufficient time for any tests to be adequately carried out (for example, sufficient time allowed to assess change in pH in collected samples). If the presence of potentially acid sulphate soils is confirmed on site, the management strategy will follow the mitigation hierarchy and avoid disturbance or exposure, and where not possible,

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	• The Applicant has now given up its pretence that it has looked for acid sulphate soils, with the tests it claimed it used being unsuitable for the identication of acid sulphate soils. We therefore know that the Applicant does not know if there are any along the route (despite the likelihoods/possibilities highlighted by Dr Dent. • The applicant will appoint an expert but has not provided qualifications of that expert. • The Applicant says, "the outline Soil Resources Plan will be updated to include more detail on the approach to managing any potential occurrences of these soils." The Secretary of State cannot properly make a decision on this basis. There is a risk to human health which is unknown and unmitigated. The CNP exception is therefore engaged.	potentially acid sulphate soils will be managed in line with the requirements of commitments GH02 and GH08 as set out in **7.2 Outline Code of Construction Practice [Revision G]**. While desk-based information suggested acid-generating soils could have been present in the Waveney Valley, our surveys did not identify any such soils down to 1.2 m bgl. If the materials are not present, then there is no risk to human health. Should further surveys identify acid sulphate soils, these would be managed as required by **7.2 Outline Code of Construction Practice [Revision G]** (measures GH02 and GH08) which would include isolation of areas and treatment/off-site disposal of acidic materials minimising risk to human health.
SS 1.2 Security & Defence	National Policy Statement EN-1 is clear that the Secretary of State may only make a decision if he "is satisfied that the impacts of proposed energy developments do not present risks to national security and physical safety, and where they do, provided that the Secretary of State is satisfied that appropriate mitigation can be achieved, or appropriate requirements can be attached to any Development Consent Order to secure those mitigations, consent may be granted." EN-1 also notes (4.16.2) that DESNZ works closely with government security agencies including the National Protective Security Authority (NPSA) and the National Cyber Security Centre (NCSC) to provide advice to the most critical infrastructure assets on terrorism and other national security threats, as well as on risk mitigation. EN-1 states that (4.16.8) if NPSA, ONR (for civil nuclear) and/or DESNZ are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of State, it will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination. In this examination of the Norwich to Tilbury DCO, the Secretary of State cannot be satisfied that there are no national security risks, nor that any mitigation (let alone appropriate) can be achieved, and therefore cannot make a decision to recommend approval of the project. This is because there is no evidence in front of the panel that the NPSA has addressed the security issues raised. There is no evidence that the Applicant has understood, let alone addressed, the security issues associated with overhead lines and Bramford Substation*. This is required under "Applicant assessment 4.16.6 Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks." 4.16.4 of EN-1 notes that Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. This has not been done.	The Applicant notes that a number of matters relating to security, resilience and operational continuity have been addressed in previous submissions during the Examination. The comments below provide further clarification in relation to the issues raised. The Applicant does not agree with the suggestion that security, resilience and continuity considerations have not been incorporated into the Proposed Development. Security has been considered throughout the development of the Project in accordance with the requirements of Section 4.16 of NPS EN-1. In particular, where national security considerations are relevant, the project has been developed having regard to applicable government guidance and through engagement with the appropriate security specialists and relevant government bodies in accordance with paragraph 4.16.6 of NPS EN-1. Security considerations have informed the design process alongside engineering, operational, safety and resilience requirements. Safety, security and resilience is a top priority for National Grid. The electricity transmission network is one of the most reliable in the world and we have security measures in place across all operations which follow the guidance set out by NESO, government, and the security agencies. National Grid engages with the National Protective Security Authority (NPSA) to understand the controls required at all National Infrastructure sites. National Grid produces technical specifications and site-specific operational requirements that meet these criteria and site-specific designs, aligned to any local threat and impact. We follow the NPSA guidance (see Appendix H of that document) and DESNZ process to ensure that we are protecting sites in line with their expectations against any threat. National Grid engages independent specialists through the Register of Security Engineers and Specialists (RSES), as an independent auditor to ensure designs meet such specified criteria. We cannot go into specifics for each site; however, these controls ensure a proportionate approach to security at each site. This process that sits outside the DCO consenting regime provides the necessary assurance and validation of National Grid plans and procedures to security threats. Proportionate controls for current and future threats, in line with DESNZ expectations, following NPSA's advice and guidance is therefore in place. Major accident and disaster risks including security threats are managed throughout the lifecycle of the Project through a comprehensive framework of statutory duties, industry standards and National Grid management systems. These requirements apply from project development, through construction and commissioning, and into the operational life of the asset, ensuring that hazards and security risks are identified, assessed and controlled using recognised good practice and proportionate risk management measures. The carrying out of risk assessments that are developed, maintained, tested and implemented in accordance with statutory requirements and established National Grid procedures are not

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	If matters are sensitive, then 4.16.9 allows for closed hearing sessions. Pylons East Anglia submission to Deadline 4 on Defence & Security is below. The points raised remain unaddressed. **PEA Ltd Deadline 4 submission points** / **Our comment on the Applicant's response at D5** Evidence of worst-case risk assessment and scenario planning, resilience design alternatives, and the respective recovery capabilities — The Applicant states, "As previously stated, the Applicant does not rely solely on compliance with the Security and Quality of Supply Standard in addressing resilience considerations. The Project has been developed taking account of broader Engineering, operational and security requirements, including consideration of credible outage and disruption scenarios through established industry and regulatory processes." Yet security of supply (SQSS) is not the same as defence security, so this does not address our points. The Applicant refers to embedded mitigation measures, as reported in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], yet this document says very little except that security fences and lighting will be installed at EACN. — No further evidence of defence measures. There is no evidence that any of the following security considerations, which the Applicant states it has carried out, have been carried out: • Alignment with guidance issued by the National Protective Security Authority • Engagement with relevant Counter Terrorism Advisors and other relevant stakeholders • Application of established security design principles and approved technologies Independent assurance processes at key stages, including design and commissioning — The Applicant simply says, "Security, resilience and operational continuity form part of the wider design, assessment and governance framework applied to critical national infrastructure projects and are considered throughout the development process". This is not evidence. "The Applicant also reiterates that security planning for critical national infrastructure is undertaken in line with established government guidance and with engagement, where appropriate, with relevant security and advisory bodies, including the National Protective Security Authority and associated	appropriate for publication owing to the sensitivity of information relating to the security and resilience of the national electricity transmission network. The requirements apply from project development, through construction and commissioning, and into the operational life of the asset, ensuring that security risks are identified, assessed and controlled using recognised good practice and proportionate risk management measures. A key stage is the handover point once a substation is commissioned to the operations team at which point the asset management systems; and the operational assurance and compliance audits come into effect. The Applicant also does not agree that the absence of detailed security information within the public application documents indicates that these matters have not been assessed. Paragraphs 4.16.7 to 4.16.9 of NPS EN-1 expressly recognise that detailed security information may not be appropriate for publication where disclosure could itself prejudice the security of Critical National Infrastructure. The level of information included within the Application has therefore been prepared having regard to those requirements. NPS EN-1 (2024) does not specify evidence is required. Paragraph 4.16.7 states that *'**the applicant should only include sufficient information in the application as is necessary** to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application'* (our emphasis). The Applicant considers we have provided sufficient information that explains the wider processes and procedures in place to safeguard existing and proposed new assets from security threats. It is a general principle that the planning system should not duplicate controls exercised by other mechanisms. With regard to the concentration of infrastructure at Bramford and other strategic substations, these locations are not the result of unplanned or piecemeal development. They reflect established transmission network planning principles, balancing network resilience, operability, environmental effects, land use, constructability, impacts on local communities and overall value for consumers. Similar strategic transmission hubs exist elsewhere across Great Britain and will continue to form part of the coordinated development of the national electricity transmission network as further generation and storage projects are connected in order to support national energy policy objectives. The Applicant also notes that a number of electricity generation and storage developments referred to during the Examination are promoted, designed, constructed and operated by independent developers. Those developments are subject to their own statutory planning processes and remain responsible for demonstrating compliance with the applicable security, resilience and regulatory requirements relevant to their respective projects. The Applicant therefore remains satisfied that the project has been designed and assessed in accordance with the relevant provisions of NPS EN-1, including Section 4.16, and that appropriate consideration has been given to security, resilience and operational continuity throughout the development of the Project.

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		stakeholders. By its nature, detailed security assessment material, operational arrangements and specific scenario planning are not appropriate for disclosure within the public domain." We request that the panel asks for this information. The Secretary of State cannot make a decision in the absence of this information.	
	We have not seen evidence that the Applicant can meet the Electricity System Restoration Standard (ESRS) for worst case scenarios, or consideration of the impact and increased risk both to this project and public safety of 'connected' projects	"The Applicant does not agree with the characterisation that the absence of publicly available detailed security documentation indicates that such matters have not been considered." It is not a characterization. There is no evidence available. The panel must have sight of the evidence. "Equally, the Applicant does not agree with speculative assertions presented regarding potential impacts, outage scenarios or risk levels associated with the wider transmission network and surrounding infrastructure." These are not speculations. They are real risks and the panel should see evidence that these risks have been considered. Since our previous submission there has been further news coverage about drone incursions into UK and European airspace, launched by the Russian shadow fleet, and including energy infrastructure targets, and of further plans for war preparedness. "The Environmental Statement has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the agreed 6.20 Scoping Opinion [APP-297]. The Applicant remains satisfied that the information provided is appropriate and proportionate for the purposes of the Examination and that the application is in accordance with section 4.16 of NPS EN-1 on security considerations." [The application is not in accordance with	

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	4.16 of NPS EN-1 until the panel is satisfied that defence and security has been full taken into account in the planning of N2T]. This continuing obfuscation remains unacceptable, and we remind the panel of the legal opinion by Lord Charles Banner KC submitted at deadline 3 which said, in paragraph 7, "This sustained obfuscation on such key questions should be deprecated by the Examining Authority and, if it is continued, adverse inferences should be made." The panel must seek answers to all of our points raised at Deadline 4, in order to be able to make a recommendation to the Secretary of State. Without this the Secretary of State cannot make a decision to approve the DCO. It may be that the answers need to be tested at an Issue Specific Hearing. EN-1 notes, in 4.1.7, that the CNP presumption does not apply to "residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence…"	
SS 1. Aviation impact	Policy • Paragraph 4.2.15 of National Policy Statement EN-1 (2024) cites the potential creation of an exception to the critical national priority (CNP) presumption with regards to residual impacts presenting unacceptable risk to, or unacceptable interference with, human health or public safety. • Paragraph 200 of the NPPF: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed." Q1. Is there a risk to human life caused by the project e.g. lack of manoeuvring space for an aircraft? Yes, according to Norfolk Gliding Club. We see no distinction between licensed or unlicencsed aerodromes or airfields If there is a risk to aircraft, there is a risk to aircraft. Q2. Is this a risk to, or unacceptable interference with, human health or public safety, as per 4.2.15? Yes. Q3. Can that risk to human life be mitigated through project design or project alternatives? No, according to Norfolk Gliding Club. Q4. Is there anything in 4.2.15 to suggest or infer or state that the risk can be removed by forcing a change of use on an existing business, club or receptor?	The Oral Summary of the Applicant's Case at 7.1a within **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]** states the Applicant's position that the exception to the critical national priority (CNP) presumption does not and cannot arise as an unacceptable risk to public safety or human health in the circumstances of Project impacts on general aviation aerodromes. The Applicant's response at 7.1 within **8.31 Response to Rule 17 letter Received 14 July 2026 [Revision A]** explains that the Applicant 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 response also provides the Applicant position that, whilst changes to the Project design are not justified, alternative mitigations exist to address impacts on the aerodrome, including reasonable changes to its operational procedures.NGC does not state that it would cease operation for safety reasons if 2 of its 7 runways were to close (contrary to the evidence of the Applicant). Allegations that it might close for commercial reasons are wholly unsupported. SS 2.4 within **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** states the Applicant's position regarding the NPPF 'agent of change' principle being most relevant to projects which are not of national significance or CNP. The position makes clear it is not required nor realistic for the Project as a CNP to have no impact on existing businesses.

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	No. Taking this further, it seems entirely irrational and unreasonable to infer that this the intention of the policy. Q5. Does NPS EN-1 override the agent of change principle? No. There is nothing to suggest that this is the case. Any mitigation must be safe: “5.5.44. Mitigation for infringement of OLS [Obstacle Limitation Surfaces] may include: agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome.” If this cannot be achieved, the risk to human life caused by the project remains. The Agent of Change principle means that the party introducing a new use or source of harm is expected to manage its effects on existing lawful uses. The burden does not fall on the receptor. Closure of the aerodrome is not mitigation of the development's effects. It is the removal of the receptor affected by those effects. The planning system normally assesses whether the development is acceptable in the presence of existing lawful uses, not whether those uses can be extinguished to accommodate the development. It flies counter to planning policy, and is entirely circular (the chicken and egg situation mentioned by the panel), for the Applicant to suggest that the absence of aircraft after closure of an aerodrome due to its own proposal can retrospectively demonstrate the absence of the safety risk that necessitated the closure. Worse than this, it makes a mockery of the planning system and risks setting a precedent that undermines public trust in the system. It would mean that the public safety CNP exemption could always be avoided by suggesting that the public whose safety are at risk simply avoid the area. It I clear that the CNP exception is brought into play.	
Miscellaneous	Dark Skies At Thorington,St, in the National Landscape, the village has succeeded in being designated a Dark Sky Village, with all residents working together to preserve the darkness. There is an observatory based there to benefit from these dark skies. This demonstrates the importance of dark skies. Planning guidance on light pollution states that: • when a development may increase levels of lighting, conditions should be set at the planning stage. • that if a development is in or near a protected area or an intrinsically dark landscape then the issue of light pollution is more important Lighting should not spill beyond the construction site. There should be none beyond the site boundary. Upward light should be minimised. In Cambridge, the Waste Water Treatment Plant DCO included a requirement for a Lighting Design Strategy. This must be approved by the local planning authority before construction. Given the extent of the project and its impact on rural East Anglia a Lighting Design Strategy is essential for the N2T DCO.	The Applicant has provided a response to this matter under items 5.4d and 5.4e in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**.

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Miscellaneous Appendix D HS2 Technical Standard - Ecology	Bats We have previously raised concerns about the level of uncertainty associated with reliance on bioacoustics recordings alone. Even for expert bat ecologists, solely relying on recordings can be misleading. If the Applicant only manually reviewed a subset of recordings, there is potential miscalculation error here, so we ask whether the data handling assumptions and sample size were sufficient to reduce the classification bias for rarer bats (for example, Myotis group remain particularly difficult to separate). We remain concerned about this approach. Our analysis of the Applicant's submissions indicates that they primarily used static bat detection methods for their surveys. They deployed "Song Meter SM4BAT full spectrum static detectors" at identified locations. These detectors were set to record automatically from 30 minutes before sunset to 30 minutes after sunrise for a minimum of 5 consecutive nights. The collected recordings were then analysed using Kaleidoscope Pro software, followed by manual quality assurance checks by experienced ecologists. However, there is no mention of roving transect walks. This could be considered a methodological constraint in determining bat commuting routes as site walks are the usual 'go to' in determining flight lines, crossing points over the proposed route, direction of flight, finding roosts etc. Bat survey guidelines are a good reference here. The author of document 6.8.A10 Environmental Statement Appendix 8.10 – Bat Activity Report - Clean Version openly admits that static recorders will underrecord some species. Further, survey activity which looks at isolated points along the route neglects the landscape use of bats, and their commuting patterns. Along the R. Brain for example, location 56 has high Nyctalus and serotine activity but there appears to be no wider assessment of landscape connectivity. Scant mention is made of the Colne, or its tributaries (e.g.: R. Roman). Barbastelle records are interesting and this species seems quite widespread across the surveys (subject to some radio tracking work. To inform an understanding of the harm caused by the project as a whole and/or mitigation approach, the wider landscape context must be understood. For comparisons, the HS2 ecology technical standards are submitted as an Appendix. Here the focus with these standards was linked to landscape connectivity and the wider ecological network (Lawton Review principles). They set a precedent that we believe should be mirrored for this large scale, linear infrastructure scheme. *HS2 Technical Standard – Ecology* *[The Applicant has not replicated this report verbatim due to its length. As stated in the document, the Applicant understands that the document was produced for the HS2 project 'to inform detailed design and delivery of ecological works for HS2 and to provide a basis for the procurement of design and construction contracts"]*	<u>Reliance on bioacoustics</u> The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within Table 3.2 in **5.9.13 Signed Statement of Common Ground - Natural England [Revision D].** The approach was developed by experienced ecologists with reference to the Bat Conservation Trust (BCT) Best Practice Guidelines (BCT, 2023). The BCT guidelines recognise that they should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced bat ecologist. In line with this guidance, a robust bat survey approach has been undertaken that is proportionate to the scale and likely impacts of the Project. Over 301,000 bat calls were recorded over the automated static survey deployment period (exclusive of noise files). The Applicant recognises the constraints of auto ID systems and possible misidentification, however, use of automated ID systems for handling large data sets such as those generated by this Project, is practical and accepted good practice when subject to a quality assurance as was undertaken on this Project. Undertaking manual ID for all 301,000 records is considered a disproportionate and unnecessary approach and is not in line with standard practice. When assessing the importance of the bat assemblage at each bat static location, a range of data sources were used, including desktop information and the results of automated static surveys, ground-level tree assessments, tree climbing surveys, radio-tracking surveys and back-tracking surveys. All these data sources were used to make an informed overall assessment of the bat assemblage and usage of a particular feature. The restrictions with respect to certain species being under recorded is common to a bioacoustics recordings and not just applicable to static detectors. It is the Applicants position that an informed, robust and proportionate assessment on bat activity across the Project has been made. <u>Roving transect walks</u> The current BCT Best Practice Guidelines (BCT, 2023) no longer identify roving transect surveys as necessary to identify commuting routes and foraging areas. Roving transect walks only capture data in the brief period between sunset and complete darkness and therefore only provide a short snapshot for bat activity. In contrast because static detectors record for the whole period of bat activity and over several nights across the activity season, this provides a far more complete picture of bat activity. This complete data set allows for robust statistical analysis where activity levels across the project area can be compared. <u>Landscape Context</u> A proportionate landscape scale approach was taken to the placing of the static detectors with all hedgerow, woodland and watercourse crossing locations reviewed with respect to habitat connectivity. Static location 50 was located close to the River Colne where a hedgerow link to the river corridor would be impacted (bats will continue to commute and forage along the watercourse as it would not be affected by construction works). Static location 56 was within woodland on the bank of the River Brain. The purpose of the bat activity survey was to assess the effect that temporary habitat fragmentation would have on foraging and commuting bats. The use of static detectors means that bat species such as barbastelle that generally appear once it is fully dark, and so tend to be missed using roving transect surveys, are being detected in more locations across Southern England. Bat activity surveys have been undertaken across the length of the Project in the form of automated static detector surveys, full details of which are included within **6.8.A10 ES Appendix 8.10 Bat Activity Report [Revision C].** Given the temporary nature of the proposed works (see below), the bat survey approach is considered comprehensive and proportionate to the scale and magnitude and duration of impacts of the Project. Following the implementation of mitigation, it is concluded that there would be an overall negligible impact with no significant residual effect on foraging and commuting bats.

<table>
<tr><th>Section</th><th>Matter</th><th>NG Response</th></tr>
<tr><td></td><td></td><td>Impacts to bats would be temporary
Replacement planting of all bat foraging and commuting routes would be undertaken on completion of works irrespective of bat usage in line with Chapter 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision G]. This will include replacement tree, native hedgerow and scrub planting to restore linear features that are bat foraging and commuting routes to ensure no medium to long-term operational effects. In certain locations where temporary vegetation removal is more than 15 m in width, and where the bat species assemblage and high bat usage feature has been identified, temporary artificial bat flyways will be installed during construction to maintain bat commuting routes in the short-term. Details of the bat flyways are included within 7.4 Outline Landscape and Ecological Management Plan [Revision G].
HS2 Technical Standard
While the Applicant acknowledges that HS2 and the Norwich to Tilbury Projects are both major linear infrastructure projects, the potential impacts on bats between projects are very different. HS2’s high-speed trains pose a far greater collision risk than overhead lines, has a larger construction footprint and most significantly the loss of vegetation and green corridors are permanent; unlike the predominantly temporary impacts identified for the Norwich to Tilbury Project. The HS2 technical standard sets out mitigation measures which have been developed specifically for the impacts generated by HS2. While many of the same mitigation principles have been followed by both projects, given the differences it would not be appropriate or necessary to mirror the HS2 bat technical standard. A bespoke approach bat mitigation approach has been developed for Norwich to Tilbury, suitable for the habitats present, geographic location, scale, duration and impacts encountered by the Project. This approach has been agreed with all relevant stakeholders, including Natural England.</td></tr>
<tr><td>Nature Opportunities: Document: 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans</td><td>[As this matter relates to ISH2 Action Point 27, the Applicant has provided a response to this section in 8.4.17 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points]</td><td>Please see 8.4.17 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A].</td></tr>
<tr><td>Colne Valley</td><td>Firstly, we attach as Appendix D a follow-up note by The Landscape Partnerhip post ISH4.
At ISH4 there was discussion about the qualities of a National Landscape, and we stated that we would follow-up in writing with our thoughts.
The qualities are landscape quality, scenic quality relative wildness, relative tranquility, natural heritage features, cultural heritage e.g archaeological remains.
We address each of those in the table below in summary form, as the full evidence has been submitted to the Applicant in various forms by various parties over the past few years, and many submissions have been made to the Inspectorate:
<table><tr><th>Characteristics</th><th>Comments</th></tr><tr><td>Landscape quality, where natural or man-made landscape is good quality</td><td>The landscape has been well preserved conserved over centuries, with the same field boundaries (ancient hedgerows), woodlands and water meadows persisting, such that the ancient character of the deeply rural, agricultural landscape feels special and worth protecting.</td></tr></table></td><td>Applicant notes the comments made by Pylons East Anglia.
The Applicant has responded to the follow-up note by The Landscape Partnership further below, in this document.
During ISH4 the ExA asked the Applicant to comment on the links between the Colne Valley and Dedham Vale National Landscape. The Applicant’s oral response to this is summarised against item 5.2a in 8.5.12 Applicant's Written Summary of Oral Submissions and Response to Points for Issue Specific Hearing 4 [REP6-118] (page 33-34). A subsequent, more comprehensive written response is also provided in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [REP6-115] (pages B6 to B7).
In summary, while the Applicant recognises that the Colne Valley demonstrates pockets of natural beauty, these are typically focused within the core of the valley and are diluted elsewhere. The Applicant considers that although locally valued, the Colne Valley is not comparable to Dedham Vale National Landscape as it fails to meet the natural beauty criteria required of nationally designated landscape. The justification for this is set out in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [REP6-115] (page B7).
The Applicant notes the Colne Valley has not previously been put forward in any historic or current proposals to extend Dedham Vale National Landscape or as a National Landscape in its own right. A description of the designation history of Dedham Vale National Landscape is included in Section 3</td></tr>
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Section	Matter		NG Response
		The landscape exhibits a high degree of integrity, with ancient hedgerow networks, woodland, water meadows and historic field patterns surviving largely intact. The continuity of these features over many centuries has conserved a deeply rural agricultural landscape with a strong sense of time-depth.	
	Scenic quality, such as striking coastal landforms	The scenic quality is unique to distinctive of north Essex (and south Suffolk???), and is due to its attractive scenery of wide valley and gently rolling hills, which are open to far-reaching views from both sides. Juxtaposition of broad pastoral valley floor with gently rolling valley sides, affording extensive views across a varied landscape of water meadows, arable fields, pasture, hedgerows and woodlands The landscape is very varied, from water meadows, to hillside hay meadows, paddocks and arable land, with a patchwork of fields separated by hedgerows and woodlands. This is a landscape that has not much changed for hundreds of years.	
	Relative wildness, such as distance from housing or having few roads	The only main road is the Colchester to Halstead Road which winds through the valley, affording spectacular views of the meadows and woodlands. Otherwise, the Colne Valley through to the Roman River consists of quiet, narrow country lanes (including some Protected Lanes), footpaths and tracks. The Essex Way passes through the area. Built form is limited to … occasional scattered farmsteads and small villages… Beyond the valleys, the A12 and Colchester exert little or no influence. Limited presence of modern development, infrastructure and urbanising influences	

of Alison Farmer Associates (AFA) report on the Special Qualities of the Dedham Vale AONB Evaluation of Area between Bures and Sudbury Area (2016).

The Applicant has considered the additional points raised in writing by Pylons East Anglia (PEA) at Deadline 6. Responses to the PEA comments related to natural beauty criteria are below. These take into account the Applicants position as set out in Appendix B of **8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [REP6-115]** (page B7):

- **Landscape quality:** The Applicant acknowledges that parts of the landscape fabric have remained intact for some time, particularly in places along the valley floor. A comparison of historic Ordnance Survey mapping against current mapping indicates that there has also been notable field amalgamation in the Colne River valley and slopes. Intensive agriculture practices have reduced the proportion of tree cover and caused deterioration of hedgerow field boundaries in places.
- **Scenic quality**: The core parts of the Colne River valley floor and slopes have a distinct sense of place and scenic qualities, shaped by the River Colne with its enclosed, relatively narrow floodplain, rising valley slopes and tributary valleys. The Applicant notes that the Planscape report **[REP5-277]** states '*Whilst the landscape does not necessarily contain rare or nationally unusual features, the combination and expression of landscape characteristics within the corridor creates a distinctive and **locally** important river valley landscape with a strong sense of place*'. (our emphasis added). This reinforces the local value placed on the landscape in terms of scenic quality.
- **Relative wildness**: The area retains a sense of remoteness in places; however, the landscape is intersected by infrastructure including the A12, A1124, B1508 and rail corridor, which reduce perceived wildness. The sense of wildness is further reduced by intensive agriculture, agricultural infrastructure and equestrian land use, modern settlement expansion and small pockets of modern commercial development (including to the south east of Fordham, west of Fordstreet and along the A1124).
- **Relative tranquillity**: In responding to PEA comments, the Applicant has reviewed the publicly available CPRE tranquillity mapping and CPRE light pollution and dark skies map (https://www.cpre.org.uk/light-pollution-dark-skies-map/). Pockets of tranquillity are identified away from the road and rail infrastructure. However, this infrastructure reduces tranquillity within the valley due to the introduction of noise, movement and visual distraction. The presence of frequent settlements and A1124 also introduces areas of light pollution along the Colne Valley which further reduces the sense of tranquillity. This is a notable contrast to parts of Dedham Vale National Landscape.
- **Natural heritage features:** There are pockets of natural heritage features such as riparian vegetation and priority habitats along the River Colne. These include deciduous woodland and floodplain grazing marsh associated with the narrow valley floor. There are also some areas of ancient woodland on valley slopes. As tree cover within the Woodland Trust's Fordham Hall Estate matures, natural heritage value will increase over time.
- **Cultural heritage** (including associations): Although the Planscape report **[REP5-277]** notes '*the landscape does not contain an extensive concentration of nationally exceptional heritage features or designed landscapes*', there is visible evidence of time depth linked to listed buildings and surviving field patterns in places. Post 1970's enclosure (as identified in Essex HLC 2011) reflects changes to the historic integrity of parts of this landscape, as does modern settlement expansion at Fordham, Aldham, Eight Ash Green and West Bergholt. The Planscape report **[REP5-277]** also notes that '*Whilst the landscape does not appear to possess nationally recognised literary, artistic or cultural associations comparable to those found within parts of the Dedham Vale and wider Stour Valley, it nevertheless exhibits a degree of **local and regional** cultural, recreational and historical association which contributes positively to its identity and*

Section	Matter		NG Response
		Landscape retains a distinctly rural character.	
	Relative tranquillity, where natural sounds, such as streams or songbird are predominant	The Colne and Roman River valleys are oases of tranquility where the footpaths, bridleways and country lanes are undisturbed by modern life. A walker or cyclist will be deafened by bird song, especially from late January onwards when the dawn chorus begins for the year, or later in the summer when the hedgerows are full of Yellowhammers singing their characteristic 'Little bit of bread and no cheeeeeeese' song while the Skylarks sing overhead and the buzzards call. At night time it is so quiet that you can hear the bats fluttering overhead. During the evening and night the absence of significant light sources contributes to exceptionally dark skies for a landscape in close proximity to a major town. ASSUMING THIS TO BE CORRECT.	
	Natural heritage features, such as distinctive geology or species and habitat	On the Roman River, the Brickpit SSSI[2] is significant for its record of pollen throughout the Hoxnian Interglacial around 400,000 years ago, and this is the best vegetational record for any British interglacial site. The Colne Valley is an unusually wide valley that was shaped over multiple glacial–interglacial cycles. The gravel, clay and alluvial soils produce a remarkable variety of habitats over short distances: • seasonally flooded wet grassland, • gravel terraces with dry calcareous grassland, • ancient woodland on heavier clays, • springs emerging where permeable gravels meet impermeable London Clay.	
	Cultural heritage, which can include the built environment that makes the	The River Colne was of great significance to the Romans, with	

appreciation.' (our emphasis added). This reinforces the local value placed on cultural associations compared to the national value placed on those related to Dedham Vale National Landscape. The Applicant has found no link between Thomas Gainsborough and the Gainsborough Line (and Chappel Viaduct) other than the railway was named in honour of the painter who was born in Sudbury in 1727 (120 years before the construction of the railway started).

In response to PEA additional comments on the Colne Valley, the Applicant's conclusion remains as stated previously, that the Colne Valley fails to meet the natural beauty criteria required of nationally designated landscape.

Section	Matter		NG Response
	area unique, such as archaeological remains or historic parkland	Romano Temple ruins at Sheepen, a few miles downstream from Fordham, and the much discussed Roman Hunting Lodge on the route of the pylons at Fordham. A Roman Road crosses the area, there are Anglo Saxon burials, a possible Saxon mill site by the river, and evidence of prehistoric activity. We remind the panel of the submission by Fordham Parish Council[3] which maps out these sites. WW2 pill boxes are dotted at regular intervals along the river, and airfields such as that at Wormingford… Parkland. Cricket willows. The intact ancient historic landscape itself.	
	Associations	Finally, as per our submission at Deadline 5, we note the importance of the Colne Valley to writers/poets: John Nash, Ronald Blythe, Edward Smythe and James Withers, and of the association with Gainsborough, who took inspiration from the landscape??? through the so-called Gainsborough Line and Chappel Viaduct, a striking and dominant feature in the Colne Valley landscape. Demos a longstanding relationship between landscape, literature and art…	
Curtilage / RVAA	At ISH 4, it was stated by the Applicant that the distance measured should be from the curtilage and not the property centre, as evidenced from the transcription: *“00:33:01:16 - 00:33:38:11 There would be or not. But what I would say is that in undertaking the work that we did, both desk based and field based. We took in consideration properties around the margin of that 200 meter zone. We also took into account guidance to the landscape Ministry guidance, which specifically said about overhead lines that 150m was the the limit from which the threshold could be breached. Um, so my, uh, answer would be that* *it's very unlikely there would be other properties like that.* *00:33:38:13 - 00:33:54:29 That's not to say, though, that there and again, written in our work, that there may be properties upon which there'd be a high magnitude of effect occurring in, in that zone, that the thing that is unlikely is that that would break, that those would break the threshold.*	In light of the question raised by Interested Parties 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 [Revision D]** (the RVAA), the Applicant has provided an update and an addendum to the RVAA at Deadline 7 (see **Document 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment [Revision D]**). 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.

Section	Matter	NG Response
	00:33:56:18 - 00:34:15:24 Understand? Thank you. Um, and the measurements for the 200m cut off, if you like. Is that taken from the curtilage of the affected properties, then Hilda for the applicant. Yes. We're very acutely aware that it's gardens, driveways, suchlike which are equally important to receptors in this regard. So it's taken from the edge of the curtilage. Okay. Thank you." Curtilage The RVAA11 document (6.13.A4) states: • LI TGN 2/19 defines Residential Visual Amenity as 'the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage' (LI TGN 2/19, Page 3, Para. 1.2). • That it is not just about visual impact on residents, "LI TGN 2/19 notes that 'Residential Amenity comprises a range of visual, aural, olfactory and other sensory components. Development can cause effects on one or more components of Residential Amenity, for example effects of noise, dust, access to daylight, vibration, shadow flicker, outlook and visual amenity. Sometimes this is referred to as 'living conditions'" Footnote 2 • "LI TGN 2/19 notes that 'For example, when assessing effects of overhead transmissions lines, generally only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA' (paragraph 4.7)" Footnote 6. However, it appears that the distances quoted in the RVAA document are to the property centre, and not the property curtilage. An analysis of the Works Plans indicates that several examples of this are as follows: • Range Cottage is listed in the RVAA document as being 152m from pylon TB169, and Halfway House 168m from TB171. However, using the property curtilage, this appears to be ~120m for Range Cottage and 115m for Halfway House. If the route were to move by the allowed 50m, this has a significant impact to those properties. • Red House, near Great Waltham is shown on the NG document as being 133m from TB141, but is actually around 100m from curtilage. • Windmill House in Great Waltham is listed as being 84m from TB141, but is actually about 43m from the curtilage, a significant difference and very close - particularly when this is to the pylon centre, not allowing for the arms of the potentially shorter pylons being used there. • In Aldham, Amora and Willows are shown as being 153m from TB54 - but in reality, the property boundary is approximately 110m. We therefore believe that the RVAA assessment for these properties is not valid. It changes the magnitude of effect significantly, and this is just a small sample population. It is of concern that there are many more properties that have been incorrectly appraised, if the Applicant has been using house centre and not curtilage for their measurements. A failure at Step 1 of the Methodology (13.2.1: Identification of properties to be considered (defining the Study Area and scope, including grouping of properties) means a failure at steps 2 to 4	

E.3 Applicant's Response to PEA Deadline 6 Submission Appendix A: Cable Ploughing

Table E.2 Applicant's Responses to Deadline 6 Submission Appendix A from Pylons East Anglia **[REP6-229]**

Matter	NG Response
1. Summary This submission outlines a review of DESNZ commissioned report *"RAF021/2425 Study of the Potential for Cost Reduction in Undergrounding Transmission Lines over Long Distances"*. The study was undertaken by Ramboll and the report issued on 12 June 2026. In previous submissions to this Examination, PEA has highlighted the potential of cable ploughing to reduce cost, save time and reduce environmental harm. The Ramboll study provides an informative review and discusses the various pros and cons of cable ploughing when compared with other undergrounding methods. It highlights, for example, a preference for cable ploughing in the Netherlands due to the environmental benefits. The Ramboll study uses baseline cost data from the report *"A comparison of electricity transmission technologies: Costs and characteristics"* published by the Institution of Engineering and Technology (IET) (Mott MacDonald, 2025). As the previously submitted PEA report *"Norwich to Tilbury Project Green Book Analysis"*, used the same data it was possible to tie the two analyses together to provide the costs for different scenarios. The high-level results are outlined in the main deadline 6 submission from PEA. PEA has previously discussed how the need for haul roads has been eliminated on some underground HVDC projects due to material movements being significantly less than equivalent HVAC projects. This is an important consideration when assessing the impact of a project. By default, haul roads are not used with cable ploughing, although the Ramboll report does warn that these may be required. The use of HVDC technology in combination with cable ploughing would appear therefore to be the optimum solution to reduce the need for haul roads. In this report some key construction parameters relating to the proposed Norwich to Tilbury project haul roads are quantified to help illustrate the impact.	The Applicant has provided a significant number of responses around these topics and PEA continues to assert positions without responding to evidence supplied at previous deadlines. The response below is consistent with our documentation and previous responses. **HVDC and HVDC Cable Ploughing** The Applicant has set out the relative costs of meeting the Project need case by different technologies, including onshore HVDC, within its response to **CA1.19 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].** This is the appropriate comparison to make as costing any other scheme, such as that proposed by the respondent that does not meet the need case, would not be taken forward as it does not fulfil the necessary connection requirement. The above responses set out differences between offshore and onshore HVDC cabling. The Applicant utilises cable ploughing offshore extensively for the evident reason set out below. The issues associated with onshore HVDC cables apply to AC onshore cables along with achieving the high thermal capacity which is required by these cables. It should also not be assumed that cable ploughing resolves all issues as numerous utilities pipes and cables need to be crossed along with multiple hedgerows and other features along with the challenges of installing each cable at greater separation than is achieved in trenching. Our recent cost updates have shown for 25/26 price base that onshore HVDC cable costs 1.6x more than offshore cabling for the following reasons: Offshore HVDC • Up to 100km of single cable or 50km of bi-pole pair cables can be carried on an ocean-going vessel per laying campaign. • Jointing of the cables is only required every 100km for single cable lay or 2 joints every 50km for cable pair. • Cables ploughed uninterrupted for long distances without obstruction on cable crossings lower than on land. Onshore HVDC and AC underground cables • Only circa 1km of single cable can be delivered within road limitation, weight and height for road transport. • Jointing of the cables is required every 1km for every cable. • Cables buried ploughed only 1km requiring joint pit every 1km. Multiple, road, rail, river, hedgerow, ditch boundaries require management. Due to the size of both HVDC and AC cables that the Applicant uses onshore, there is always a requirement for jointing every kilometre, and achieving thermal ratings makes installation methods critical to delivering capacity. The Applicant's proposed method ensures delivery of assets that meet the need requirements. **Haul Roads** Haul roads are required to deliver the cable drums to location for installation for both cut and cover, and cable ploughing solutions. As stated in the **Applicant's response to Examining Authority question LV 2.2, as provided in 8.9.2 Applicant's Response to Second Written Questions [REP5-211],** only circa 1 km of 400 kV AC cable and 525 kV HVDC cable can be delivered on a road legal UK vehicle, with weight and height restrictions. However constraints along the alignment of the route can further impact the available length of each cable section. The cable system design and preferred bonding strategy can also impact the section lengths. Taking a reasonably worst case an average

Matter	NG Response
	cable section length of 800 m can be assumed; although some sections may be shorter they would be outweighed by longer sections elsewhere along the route. Therefore, regardless of cable installation method, a haul road would always be required, to get the cables to the installation location. Also, a cable joint bay will be required approximately every 1 km, for both AC and HVDC cables to joint the circa 1 km sections of individual cables together
2. Introduction This submission discusses Ramboll report *"RAF021/2425 Study of the Potential for Cost Reduction in Undergrounding Transmission Lines over Long Distances"*[1], which was issued on 12 June 2026. As outlined in the report's introduction Ramboll was appointed by DESNZ *"to undertake a high level study (UKSBS, 2025) to identify if there is potential for cost reduction in undergrounding transmission lines over long distances of 20km and 50km by using unconventional or innovative undergrounding methods"*. Such a study is welcomed by PEA. The use of conventional open cut excavation, which is referred to as *"cut and cover"* in the Ramboll report, can be very slow, costly and harmful to the environment. This is particularly the case with underground HVAC due to the extensive amount of excavation required. One of the alternative undergrounding methods assessed in the study was cable ploughing. Information on this method has previously been presented to the ExA by PEA. This demonstrated how cable ploughing can be a quicker, cheaper and lower impact method of laying underground cables. Included at Deadline 1 was an evidence report in Appendix B of *"EN020027-001370-Pylons-East-Anglia-Ltd-written-post-hearing-submissions.pdf"* [REP1-266]. The introduction to the Ramboll report goes on to state: *"Cost is a key consideration when making decisions on technology solutions, however such decisions are also informed by several wider considerations including environmental impact and operability. The report is intended to fill an evidence gap in respect of the build costs of non-traditional undergrounding methods, and the reader should refer to more detailed studies for costs of traditional methods. This report documents a literature review and qualitative assessment to identify emerging undergrounding technologies and assess their benefits and disbenefits against key criteria, taking three forwards for further investigation."*	The Applicant has identified the following issues associated with cable ploughing that need to be considered and are not addressed in detail within the Ramboll report: The use of cable ploughing for the installation of both AC 400kV Cables and HVDC 525kV Cables the following issues have been identified • The size of the 400kV AC and 525kV HVDC cable drums would be unchanged. • For AC and HVDC, circa every 1km for a joint bay would need to be created to join cables together. • A haul road would still be required to get the cable to the installation section, as only circa 1km of a single cable can be transported on a cable drum. • Obstacles such as roads, railways, rivers, protected woodland and any other feature in the landscape would still require other installation techniques. • Techniques for deploying thermal backfill as part of ploughing process need to be tested to ensure cable ratings can be maintained. The circuit rating of 3,465MW or 5000A is the highest 400kV IEC rating circuits operating worldwide. • Thermal separation between the cables phases in the trench system cannot be maintained with ploughing so cables need to be spread wider. • There will be a need for pre-ploughing or ripping hard ground. • It cannot be used if the area where the topography is largely rock, especially areas of granite rock with no substrate soil. Many of the issues listed above have not been tested or demonstrated at scale, circuits achieving 5000A have some of the hardest thermal management issues proven with existing installation and not in ploughed installations. The issue of cost assessment is set out in detail below, as to why such installations do not improve cost effectiveness.
3. General points from the Ramboll report relating to cable ploughing 3.1 The Ramboll report reviewed the following methods for underground transmission cable installation: Cut & Cover (the Baseline), Cable Ploughing, Horizontal Directional Drilling (HDD), Microtunnelling (Pipe Jacking), Direct Pipe, E-Power Pipe, Auger bore and Pipe Express. 3.2 When discussing cable ploughing the report states: *"In summary cable ploughing can be a cost-effective way of laying distances of cable in soft soils as it is significantly faster than traditional trenching methods. This can reduce labour costs, and there is less surface disturbance, reducing the need for costly and time-consuming restoration work."* 3.3 The report states that *"…large principal contractors tend to prefer cut-and-cover as a construction method they are familiar with, with any increase in costs passed to clients".* 3.4 And: *"In the Netherlands, carbon footprints and dewatering issues led clients to instruct principal contractors to adopt cable ploughing as the installation method. Clients tend to recognise advantages in cable ploughing and consider it to be the preferred solution in subsequent projects."* 3.5 The study carried out a qualitative assessment that uses *"selected criteria with a weighted scoring system to evaluate the undergrounding methodologies with the most potential of reducing costs for transmission lines over long distances of 20km and 50km"*.	

Matter	NG Response
3.6 From this the report states: *"Cable ploughing (2.4) and HDD (2.4) score the highest, comfortably ahead of the other methodologies, mostly due to cost but also technical feasibility and minimising impact"* [the figures in brackets are the individual scores]. 3.7 In relation to this the report states: *"As part of the qualitative assessment carried out in the present study, cable ploughing was considered one of the installation solutions with the highest potential to reduce costs."* 3.8 Under the Environment heading the report states: *"The damage to the ground and the reinstatement required for cable ploughing is much less than cut-and-cover. However, trenchless methods like HDD can minimise that even further with very little surface disruption in both the temporary and permanent cases"*. 3.9 Under the Energy Security heading the report states: *"For all of the technologies considered, the fact that the cables are buried underground means that they are more protected against extreme weather such as storms, high winds, trees falling, fire and lightning than overhead lines"*. 3.10 The summary of the cable ploughing assessment from the report follows: **Summary** Cable ploughing presents an efficient and cost-effective method for underground transmission cable installation, particularly in rural and arable land settings. While cost reductions can be achieved for larger-scale projects, limitations in ground conditions and regulatory requirements must be carefully managed. The method offers significant benefits in reducing disruption and installation time but may not be viable in more urbanised areas and becomes less cost effective where strict sand backfill requirements exist. Continued innovation in equipment and installation techniques will further enhance its feasibility for large-scale deployment. **Pros:** • Cost-effective over long distances compared to cut-and-cover. • Fast installation speeds with minimal surface disruption. • Environmentally preferable in certain contexts (some clients mandate ploughing due to carbon footprint considerations). • Can potentially reduce the need for heavy civil works and temporary access roads. • Flexible in handling a variety of ground conditions. • Lower per-metre cost for large-scale projects. • **Cons:** • Limited effectiveness in urban areas due to frequent obstacles. • Pre-ripping may be required in certain terrains, adding cost. • Strict client specifications (e.g. mandatory bedding) can negate cost advantages. • Depth requirements may necessitate additional equipment or slower speeds. • Some projects require trenchless crossings or excavation work, increasing complexity.	
4. General recommendations from PEA The Ramboll study is an important piece of work, with a lot of detailed information on the key methods used for underground transmission cable installation. For any further work in this area, PEA would like to make the following general recommendations: • The scope of the study was limited to project lengths of 20km and 50km. As HVDC underground cables can be significantly longer than this, it would be beneficial to extend the scope. For example, the onshore HVDC option included in the 2025 IET report is 700 km long. Including the same length in the study would also ease comparison.	Please see the response to part 1 of the report, above.

Matter	NG Response
• The Ramboll study did not include 525 kV HVDC, even though this has become the new standard. This could have implications on the costs. For example, when compared with a 400 kV HVDC circuit of the same power transmission capacity, the heating effects would be substantially reduced due to the lower current. This could potentially reduce the need for imported backfill and hence alter the assessment.	
5. Baseline Costs 5.1 For baseline costs the Ramboll study uses data from report *"A comparison of electricity transmission technologies: Costs and characteristics"* published by the Institution of Engineering and Technology (IET) (Mott MacDonald, 2025)[2]. This is subsequently referred to here as the "2025 IET report". 5.2 It is important to note for comparison purposes that the figures quoted in relation to the 2025 IET report are the typically the *"Lifetime Power Transfer Cost"*, whereas the Ramboll report uses the *"Total Build Cost"*, which is a component of the *"Lifetime Power Transfer Cost"*. 5.3 Comparison was made between the Total Build Costs extracted from the 2025 IET report and those from the Ramboll report, after converting into the "£/MWkm" format used in the Ramboll report. While there was very good agreement with the HVAC figures, there were discrepancies with the HVDC figures. 5.4 Consequently, for the HVDC cable ploughing cost calculations in this report, baseline costs directly obtained from the 2025 IET report were used. These are then applied in conjunction with factors derived from the Ramboll report for the relative cost of cable ploughing to "cut and cover" to establish the impact on cost. 5.5 PEA will provide DESNZ with feedback on the discrepancies noted in the Ramboll report, as the report was commissioned by DESNZ.	It is noted that PEA will be providing feedback to DESNZ; the Applicant has no comment.
6. Qualitative Assessment Table 2 of the Ramboll report provides a *"Qualitative assessment of underground methods against key criteria"*. The table shows that Cable Ploughing and HDD have the joint highest overall score of 2.4, compared with the Cut & Cover (Baseline) at 2.1. The results are very dependent on the weighting, and it is noted that "Minimising impact" only has a weighting of 10%. If an equal weighting of 25% was given to the four criteria, which is more in line with NESO HND methodology, the differences in the Overall score become even more distinct: Cut & Cover (Baseline): 1.75 Cable Ploughing: 2.0 HDD: 2.5	Noted.
7. Cable ploughing cost calculations Underground HVDC circuits from Norwich to Tilbury 7.1 In August 2025, PEA issued a Green Book analysis for the Norwich to Tilbury project. The work was, in part, prompted by the publication of the 2025 IET report in April 2025, on the basis that this meant that much better build cost data had become available. The previous version of the IET report was issued in 2012, and there have been significant changes to both the cost and the technology landscape since then. 7.2 The accompanying report *"Norwich to Tilbury Project Green Book Analysis"*[3] was issued to Ofgem immediately on completion of the work in August 2025. It was then made generally available and it was included as part of the representation by Pylons East Anglia Ltd submitted to the Norwich to Tilbury Examination on 26 November 2025.	**Cost** Please refer to Pages 33 – 49 **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** which sets out the applicants Alternatives considered. The analysis set out within these documents does not change regardless of cable ploughing which can only affect in proportion the installation cost of HVDC and AC cables. Please refer to the extract below 'Underground Cable Buried -15km – High Rating cost' from page 56 of the "A Comparison of Electricity Transmission Technologies; Costs and Characteristics" an independent report by Mott MacDonald in conjunction with the IET (the IET report). This clearly shows installation costs only make up 1/3 of the overall cost of cables which includes all the costs of cable jointing, cable delivery etc, which are still required with cable ploughing. Therefore, cable ploughing can only have a limited impact in the installation cost element only i.e. a limited reduction in this cost if identified limitations with cable ploughing set out below could be overcome.

Matter	NG Response

7.3 As the infrastructure cost data used for the Green Book analysis was obtained from the 2025 IET report, this provided the baseline data for the cost comparison with cable ploughing.

7.4 This involved creating a cable ploughed variant of option “Onshore HVDC VSC – 181 km – Rating 2,000 MW” modelled in the Green Book analysis.

7.5 As was the case with the Ramboll study, the IET underground costs are assumed to be cut and cover. The use of cable ploughing for 400 kV (or above) was dismissed by the authors of the 2025 IET report.

7.6 To derive the cost of a cable ploughed version of the HVDC underground option the IET derived variable build cost was multiplied by the corresponding cost ratio from the Ramboll report. The fixed build cost and operating costs remained the same as those used for the original cut and cover variant.

7.7 The cost factor used was the Ramboll figure (in “£/MWkm”) for “Cable Ploughing” divided by the corresponding Ramboll figure for “Cut & Cover. For both figures the “Med 400kV DC”, “Sand” backfill, “Flat” cable formation and “50km” length option was chosen.

7.8 The cost factor was calculated at 78.6%, corresponding to a 21.4% reduction in the variable build cost. The factor therefore falls within the band stated in the Ramboll report that cable ploughing can *“reduce the total build costs to 60% to 80% that of cut-and-cover, a reduction of up to 20% to 40%”*.

7.9 To provide a further reference, the corresponding factor for the HVAC underground option was calculated at 66.5% corresponding to a 33.5% reduction in the variable build cost.

7.10 The build cost totals calculated for the 181km onshore HVDC circuit investigated are presented in the following table. These include the associated converter costs.

Capacity (GW)	Build Cost Total (£ million) “Cut & Cover”	Build Cost Total (£ million) “Cable Ploughing”
2	£990	£925
4	£1,980	£1,849
6	£2,970	£2,774

7.11 This therefore indicates, for example, that cable ploughing would reduce the Total Build Cost of a 181km 4 GW project (two 2 GW circuits) by £131 million (the same reduction would apply to the Lifetime Power Transfer Cost).

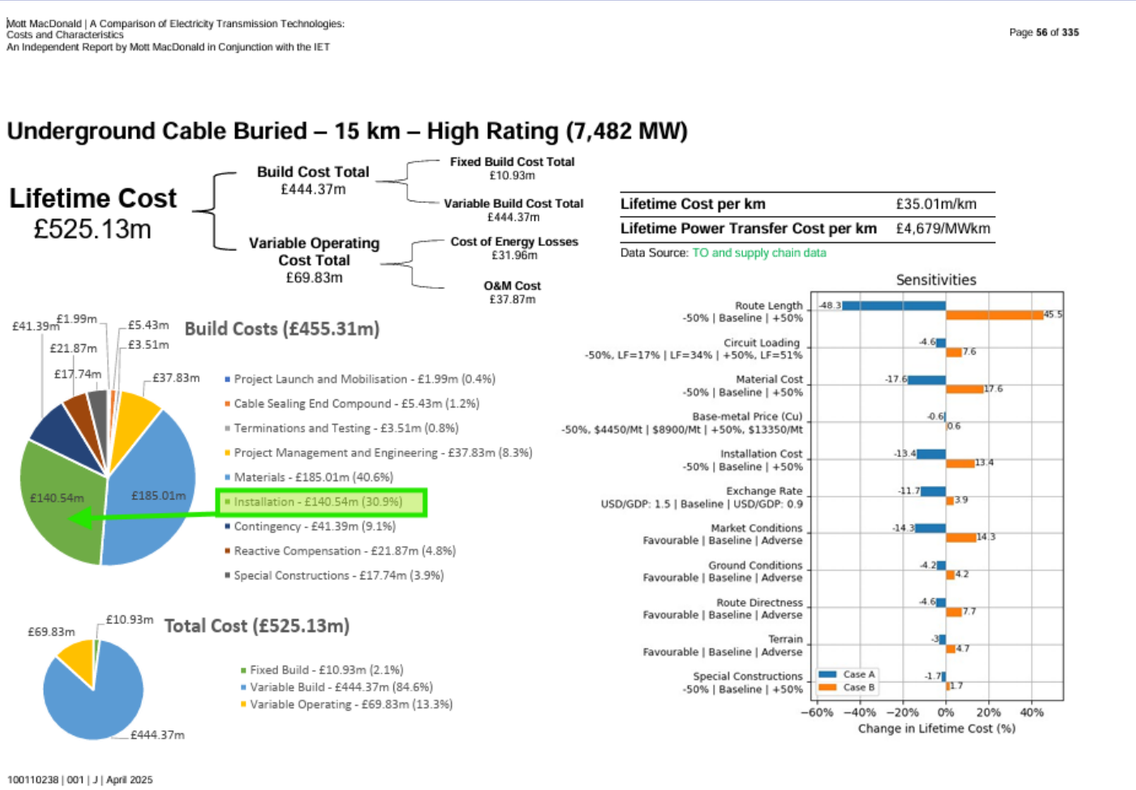
Alternative scenarios for underground HVDC circuits from Norwich to Tilbury

7.12 The Ramboll report states: *“there may be some scenarios in which the decision to underground DC rather than AC does not affect the number of converter stations needed, but only their location. This might for example arise if connecting a node which is already planned to be DC (such as an offshore windfarm with a HVDC export cable) to an AC node point to point. In such a scenario, it may be appropriate to exclude the cost of converter stations when considering undergrounding options”*.

7.13 An example of such a scenario has previously been highlighted in submissions from PEA, and this is outlined here.

7.14 Current plans entail the 2.9 GW HVDC output from Hornsea 3 being converted to HVAC at Norwich.

7.15 If the converters were located at Tilbury instead of Norwich, the additional cost would purely be the cost of additional cabling between Norwich and Tilbury. There is no need for additional converters, and it therefore avoids the substantial costs associated with these.



The Applicant also notes the Department for Energy Security and Net Zero and Ramboll report “RAF021/2425 Study of the Potential for Cost Reduction in Undergrounding Transmission Lines over Long Distances”, makes the following statement on page ii of the Executive Summary

“In the case of undergrounding AC circuits, the lowest cost method is cable ploughing in flat formation, however this remains over 5 times the build cost of double circuit overhead lines (OHL) on pylons for Medium capacity circuits”

Noting that the report does not refer to High Capacity circuits that Applicant is proposing which is at an even higher cost.

For HVDC where the report is comparing the cost of HVDC cable costs with HVDC overhead line cost (i.e. this section does not include the cost of convertor stations) the report states

“The build cost for undergrounding DC using cable ploughing falls to around 2.5 times that of OHL for Low capacity circuits and 3.5 times for Medium capacity”

Again, the report does not state the higher costs of high capacity circuits, when high capacity circuits are required by the applicant as set out Pages 23 – 32 **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** which sets out the applicants Need Case and Timming.

Therefore, the applicants costs set out in Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, presents the costs, based on a transparent economic appraisal. These cost benchmark to the IET report and remain representative and aligned with the comments in the Ramboll report with respect to the differential in cost of Overhead Line and cable technology regardless of installation method. All of these references show that cost parity with Overhead Lines is not possible, as the cost of undergrounding even removing installation cost completely, is higher than the cost of Overhead Line, Ramboll stating 5 times higher in their report in comparison to medium capacity.

Matter	NG Response
7.16 Costs were calculated for two 2 GW circuits using the 2025 IET data. The length of each circuit was assumed to be 181 km (2 circuits would be required to avoid exceeding the 2 GW limit for each circuit). 7.17 This resulted in a variable build cost of £612 million for conventional, cut and cover, cable laying. 7.18 By factoring the calculated build cost to adjust for cable ploughing, as outlined earlier in this section, the variable build cost becomes £481 million. 7.19 This therefore represents an extremely good value and low impact method of delivering 2.9 GW from Norwich to Tilbury. 7.20 The power would be delivered by 4 cables (2 pairs) in 2 trenches, instead of the current HVAC plans where, for the underground sections, the 6 GW capacity requires 18 cables in 6 trenches. 7.21 It could also be delivered very quickly. Hornsea 3 is expected to be completed around the end of 2027[4]. 7.22 As a comparison, again using figures from the 2025 IET report, the variable build cost of the currently proposed Norwich to Tilbury 6 GW HVAC underground section alone is £542 million, assuming a length of 22 km. 7.23 Appendix G of Pylons East Anglia submission [REP5-265] discusses how the 3.48 GW of total capacity from the North Falls and Five Estuaries Offshore Windfarms plus the Tarchon Energy Limited Interconnector could be connected to the grid also using HVDC transmission to minimise the impact. The result when added to the Hornsea 3 output would therefore be a potential total HVDC capacity of 6.38 GW. 7.24 It is acknowledged that it is not for PEA to propose solutions. PEA also does not have the resources to consider the many permutations of options that are likely to be available. It is also accepted that the build of Hornsea 3 is already very well advanced. 7.25 However, this shows that locating the converters at Tilbury instead of Norwich would have saved very significant amounts of money, resulted in a solution that minimised harm and could have been delivered very quickly. 7.26 This exercise demonstrates that other potentially far less harmful and viable alternatives are available and have not been considered. 7.27 In this example, cable ploughing has the potential to further enhance the viability of an option, by offering a faster means of laying the cables and at the same time reducing the cost and the harm caused.	**Cable Ploughing -** Please refer to the Applicant's comments against part 2 and 3 above. **HVDC Cable Ploughing** – please refer to the Applicant's comments against part 1 above.
8. Haul roads 8.1 PEA submission *"Response to Section 3 of [REP4-300] 8.4.10.1…"*, which is Appendix G of [REP5-265], discusses how other developers have demonstrated that with underground HVDC the need for haul roads can be eliminated and how this would result in a very significant reduction to the impact. 8.2 By default, the construction of haul roads is not required for cable ploughing. 8.3 The Ramboll report for example discusses how with cable ploughing *"the amount of backfill material and disposal of spoil is eliminated or minimised"*. 8.4 The Ramboll report does warn though that: *"Bedding supply – depending on ground conditions, the provision of bedding to site may require the construction of haul roads, which significantly raises costs"*. 8.5 However, due to the considerably greater amount of bedding materials needed for HVAC when compared with HVDC (due the number of trenches and their larger widths), this is more likely to apply to HVAC than HVDC. 8.6 Calculations were carried out using the Applicant's latest haul road drawing *"2.6.3 Design and Layout Plans - Traffic and Transport (Final Issue A)"* [APP-043].	Haul roads are required to deliver the cable drums to location for installation for both cut and cover, and cable ploughing solutions. As stated in the **Applicant's response to Examining Authority question LV 2.2, as provided in 8.9.2 Applicant's Response to Second Written Questions [REP5-211],** only circa 1 km of 400 kV AC cable and 525 kV HVDC cable can be delivered on a road legal UK vehicle, with weight and height restrictions. However constraints along the alignment of the route can further impact the available length of each cable section. The cable system design and preferred bonding strategy can also impact the section lengths. Taking a reasonably worst case an average cable section length of 800 m can be assumed; although some sections may be shorter they would be outweighed by longer sections elsewhere along the route. Therefore, regardless of cable installation method, a haul road would always be required, to get the cables to the installation location. Also, a cable joint bay will be required approximately every 1 km, for both AC and HVDC cables to joint the circa 1 km sections of individual cables together Therefore the requirement for Haul Roads and their size, cost and location is unchanged by installation technique with each individual cable being delivered by a 1km drum on the UK roads.

Matter	NG Response
8.7 The drawing shows an *"Illustrative haul road 6m (widening to 8m for passing places)"*. For the purposes of these calculations the passing places were assumed to relate to 25% of the length of the route, resulting in an average width of 6.5m. 8.8 This is therefore comparable with the width of two motorway lanes, which are typically 3.65 m wide[5]. This temporary road would essentially run from Norwich to Tilbury. 8.9 For the purposes of this assessment the total haul road length was assumed to be the route length of 181km. It is likely though to be longer than this as, for example, in some places the haul roads required for HVAC undergrounding run parallel to those required for the OHL construction. 8.10 The calculations show that this would result in a land take of 118 ha for the haul road surface alone. Even though this land take is temporary, the effects of soil compaction would result in permanent harm. 8.11 Using a calculated average depth of 0.3275 m from the data provided on the Applicant's drawing, the compacted volume of aggregates is 385,304 m³. A similar amount of material needs to be excavated to allow the haul roads to be built. 8.12 *"HS2 Learning Legacy"* document *"Temporary access road optioneering and cost analysis"*[6], published on 17 September 2020, provides useful information on the merits of different types of temporary access roads, including the type specified for this project. 8.13 Applying the data from the HS2 report results in a material cost of £37 million for the haul road. It is to be noted that this assumes an average depth. The maximum depth can be more than twice the average, and as the HS2 report was published in September 2020, the costs are also likely to have increased significantly. Maintenance costs are additional. 8.14 In addition, as shown on the Applicant's drawing, also associated with the haul roads are drainage swales and boundary fence foundation excavation, as there is a fence on both sides of haul road. 8.15 One issue highlighted by the HS2 report is that this form of construction leads to greater dust pollution than the other options investigated.	

E.4 Applicant's Response to PEA Deadline 6 Submission Appendix B Flood Risk Response

Table E.3 Applicant's Responses to Deadline 6 Submission Appendix B from Pylons East Anglia **[REP6-229]**

Matter	NG Response
Report providing a rebuttal to the Applicant's document 8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202], specifically the section responding to PEA's Deadline 4 comments on the updated drainage strategy and appendix. *This includes:* • *A correction to PEA's own quotation of NPS EN-1 as made in its Deadline 4 submission* • *A response to the Applicant's position on Critical National Priority policy and the onshore flood exception, in which it is stated that* i *The Applicant's SOCGs at Deadline 5 do not demonstrate the progress it described in REP5-202* ii *Similarly, the Deadline 5 Drainage Strategy does not evidence the engagement it relies upon* • *A row-by-row rebuttal of the Applicant's response to PEA comments on 16 Water Environment Written Questions form ExQ1* *A request of 8no. items relating to the water environment that PEA consider the ExA should require of the Applicant.*	It has been evidenced in the Applicants position with the relevant Statement of Common Grounds that this matter has been scrutinised by the Statutory Stakeholders. In the final Statement of Common Grounds that have been submitted at Deadline 7, the Applicant has been able to progress many of the matters to "Agreed" with these parties, noting that the Statement of Common Grounds with the Environment Agency (see **[REP6-049]**, Suffolk County Council (see **Document Reference 5.9.2 [Revision E]**) and Thurrock Council (see **Document Reference 5.9.4 [Revision E]**) in their role as Lead Local Flood Authorities (LLFA) record all Hydrology, Land Drainage and Flood Risk matters as "Agreed". The position of Essex County Council as LLFA is that, whilst they have no significant concerns, until the next level of detail is available with regard to the surface water drainage designs for the Project, they are not in a position to agree all matters (see **Document Reference 5.9.3 [Revision F]**). The LLFA are content that this information will be provided as secured by commitment GG22 in the Outline Code of Construction Practice. The Applicant's position has not changed since the prior response to Pylons East Anglia in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**. The Applicant has assessed these matters through the Environmental Statement, the Flood Risk Assessment and the Drainage Strategy. The Applicant considers that the assessment and mitigation

Matter	NG Response
	presented are proportionate to the nature, scale and current design maturity of the Proposed Development. The Applicant will continue to engage with the relevant statutory stakeholders, including the Lead Local Flood Authorities and the Environment Agency, as the design develops. The Applicant notes the requests made to the Examining Authority in Section 4 of Appendix B of Pylons East Anglia's submission **[REP6-229]** and considers that these matters have already been appropriately addressed during the Examination. The majority of the points raised were previously responded to in Section 18 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, and the Applicant's position remains unchanged.

E.5 Applicant's Response to PEA Deadline 6 Submission Appendix Bi: Report to the Examining Authority Norwich to Tilbury Project – Chelmsford 6 Section Flood Risk Concerns Relating to Roxwell and the River Can Catchment

Table E.4 Applicant's Responses to Deadline 6 Submission Appendix Bi from Pylons East Anglia **[REP6-229]**

Matter	NG Response
Report from Roxwell Flood Prevention Group on its concern regarding the 'Chelmsford 6' section of the Norwich to Tilbury Project. The concern, in summary, is that the it is one of the most hydraulically sensitive parts of the River Can catchment and creates an unnecessary risk on communities already impacted by flooding, when a viable offshore alternative is available. *The report provides information on the existing catchment and flooding issues, including an example of a flood event in 2016, as well as the potential impact of climate change. It sets out the impacts of development on floodplains and the potential long-term and cumulative effects of development, including temporary works.* *The report raises concern on safety and evacuation during flood events; the potential conflict with natural flood management schemes; concern on flood modelling; and, the downstream consequences of development.* *The Report makes a request of 7no. items it believes the ExA should request of the Applicant.*	The Applicant notes the requests made to the Examining Authority in the Summary Section of the report from Roxwell Flood Prevention Group, included in Pylons East Anglia's submission **[REP6-229]** and considers that these matters have already been appropriately addressed during the Examination. The Applicant has produced a robust **7.9 Flood Risk Assessment [APP-331]** and **8.2 DCO Drainage Strategy [Revision D],** in addition to **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [Revision C].** The **7.9 Flood Risk Assessment [APP-331]** has been informed by all current datasets and has identified mitigation measures to manage fluvial flood risks to and arising from the Project, which has been agreed with the Environment Agency. This is evidenced in the Statement of Common Ground between the Applicant and the Environment Agency that has been submitted at Deadline 7 (**5.9.15 Signed Statement of Common Ground - Environment Agency [REP6-049]**), where all Hydrology, Flood Risk and Land Drainage matters are recorded as agreed.

E.6 Applicant's Response to PEA Deadline 6 Submission Appendix C Note on the Applicant's Response to Pylons East Anglia's (PEA) Heritage Rebuttal

Table E.5 Applicant's Responses to Deadline 6 Submission Appendix C from Pylons East Anglia **[REP6-229]**

Matter	NG Response
Note on the Applicant's Response to Pylons East Anglia's (PEA) Heritage Rebuttal **[REP4-369]** Summary position The Applicant's reply (REP4-300/REP4-318 and associated cross-references) does not engage with the substance of Pylons East Anglia's (PEA's) rebuttals throughout the course of this DCO. Instead, it restates prior conclusions, repetitively re-asserts that the approach is "robust and proportionate," and points to other documents rather than answering the specific points raised. This pattern is repeated across every heading in the response: methodology, setting, cumulative harm, mitigation hierarchy and scoping, and it is most clearly exposed at Kenningham Hall (1373056), where the Applicant's own	The Applicant does not agree with PEA's characterisation of its response. The Applicant's submissions at **REP4-300, REP4-318,** and the associated cross-referenced documents were prepared to address the matters raised by PEA in a clear and proportionate manner. Where the Applicant has cross-referred to other submissions, this is because the relevant issue has already been addressed substantively elsewhere in the Examination documents. In those circumstances, cross-referencing is an appropriate and efficient means of avoiding unnecessary repetition of material already before the Examining Authority. The Applicant considers that this approach supports clarity and usability of the Examination library, while ensuring that the Examining Authority is directed to the relevant analysis, evidence, and conclusions on each point. The use of cross-references should therefore not be taken to indicate that

Matter	NG Response
assessment is contradicted by the physical evidence that PEA has identified. The text emphasised in bold below summarises PEAs response to the latest document 8.4.13.1 provided by the Applicant. In summary, the Applicant has failed to respond appropriately to the points presented by PEA, with the result that concerns raised have been left unaddressed rather than rebutted.	matters have not been addressed; rather, it reflects that those matters have already been dealt with in detail in the Applicant's previous submissions and supporting documents. For the requested details, see below.
1. Repetition Rather Than Rebuttal The Applicant's reply is structured almost entirely as a signposting exercise. Under each heading (Methodology, Assessment of Setting, Substantial Harm, Mitigation Hierarchy, Cumulative Effects, Scoping, Landscape and Scale, EN-1), the same formula recurs: a restatement that the methodology is "robust, proportionate" and "agreed with Historic England," followed by a list of paragraph references in other submissions. PEA's specific objections have always been and continue to be: • that the matrix-based approach is inappropriate and obscures professional judgement, • that the presence of screening (either by trees or other buildings' is wrongly equated with 'no harm', • and • that "Low-Mid Less than Substantial" harm is being applied to changes that would in fact severely impact the setting of heritage assets as a result of infrastructure which would dominate the landscape. The Applicant has not responded to these concerns adequately anywhere in the response. Reasserting a conclusion is not the same as addressing why that conclusion was challenged.	The Applicant notes PEA's criticism of the Applicant's responses, and the concern regarding the use of cross-reference to earlier submissions. The Applicant also notes that PEA does not agree with the matrix-based approach, which the Applicant assumes to be a reference to the determination of significance of effect as this is the only element of the methodology that includes a matrix. However, the Applicant did take the necessary steps to ensure that the methodology including the approach to assessing significance of effect was discussed on multiple occasions during the development of the Project and, importantly, agreed with the relevant stakeholders, Local Planning Authorities and Historic England from the early stages of the Project (See Statements of Common Ground, references 5.9.1 – 5.9.12 and 5.9.14). That approach has been refined through the course of those discussions. The fact that PEA would prefer a different approach does not demonstrate that the methodology adopted is inappropriate or deficient. The Applicant is therefore satisfied that following consultation and agreement with relevant historic environment stakeholders the methodology is appropriate and follows the approach taken on many other EIA developments, including consented NSIPs, and has no further submissions to make in response on this point. Regarding the two other objections, as PEA itself acknowledges, these points have already been raised, and the Applicant confirms that they have already been addressed. If PEA is concerned by the Applicant's use of cross-referencing, the Applicant must nevertheless refer to **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**, where these precise objections are addressed. Those cross-references were provided because the Applicant had already explained its position on the assessment of harm and did not consider it necessary to repeat that material at length. As already set out, the Applicant's assessment is not a generalised exercise. Each asset has been assessed individually, having regard to the relevant evidence before the Examination. The assessment of harm and the setting assessment have been informed by a combination of site visits, baseline data, and supporting visualisations used as an aid rather than a requirement, with viewpoints refined during the assessment process. The Applicant therefore considers that the issues raised by PEA have been fully addressed during the Examination and that the underlying disagreement is one of professional judgement rather than methodology, process or evidential sufficiency. The Applicant remains entirely satisfied that the historic environment assessment is robust, proportionate and compliant with the relevant legislative, policy and guidance framework, and therefore has no further submissions to make on these matters.
2. Overuse of Cross-Reference in Place of Engagement Across the extract, the Applicant cites at least a dozen separate documents (REP4-300, REP4-318, REP3-070, REP3-074, REP4-083, REP4-299, APP-209, APP-356, and the forthcoming Deadline 5 responses) rather than setting out the substantive reasoning in the document meant to respond directly to PEA's concerns. This has resulted in two outcomes: it makes the response very difficult to test against the specific rebuttal points made, and it allows the same unresolved assertions to be recycled from submission to submission without ever being tested against PEA's evidence. A reply that mostly says "see elsewhere" is not a substantive answer to a methodological challenge; it is an index of where the same answer has previously been repeated.	The Applicant notes PEA's comments regarding the use of cross-referencing within its Examination submissions. The Applicant does not agree that references to previous submissions constitute a failure to engage with the matters raised. The purpose of the references provided is to identify where the Applicant's reasoning, evidence and professional judgements are set out in detail. The issues identified by PEA have been the subject of extensive discussion throughout the Examination and have been addressed in detail within the Environmental Statement, written responses, hearing submissions and Statements of Common Ground. Where the same points have been raised repeatedly, the Applicant has considered it proportionate and appropriate to direct the Examining Authority to the submissions where those matters have already been addressed in full, rather than reproducing substantial volumes of text across multiple documents. The Applicant therefore relies on its previous and current submissions.
3. Reliance on Historic England Agreement which has not been Confirmed.	A final Statement of Common Ground with Historic England has been submitted to the Planning Inspectorate at Deadline 7 (see **Document Reference 5.9.14 [Revision E]**. Whilst there have been

Matter	NG Response
The Applicant repeatedly relies on “agreement with Historic England” as the basis for confidence in the methodology. PEA's rebuttal specifically notes that the Statement of Common Ground with Historic England has not been finalised and that Historic England remains in dispute over multiple issues. The Applicant's response does not address this discrepancy; it continues to cite the draft Statement of Common Ground as though settled agreement exists. This is a further instance of restating a conclusion rather than resolving the challenge to its basis.	points of discussion between Historic England and the Applicant in the finalising of the document, none of these points relate to the Historic Environment assessment methodology employed by the Applicant as this has had long-standing agreement with Historic England as demonstrated by the version of the SoCG submitted at Deadline 1 **[REP1-036]** after Historic England had reviewed the submitted documents.
4. Applicant’s Methodology Tested Against the Evidence As with all responses from PEA, it is impossible to cite every heritage asset that has been underassessed or wrongly identified due to a lack of resources. Nonetheless, PEA has produced countless examples of heritage assets which they believe have been wrongly or under assessed, and have been able to demonstrate that (despite the Applicants consistent statement to the fact that no listed buildings are located within the DOL) at least one listed building is located within the draft order limits (curtilage buildings associated with Kenningham Hall, NHLE 1373056). PEA has identified, from the 1882 OS map, that buildings within the farmstead are curtilage-listed rather than non-designated, and that the Development Order Limits (DOL) for the project cut directly through that curtilage group, with the moated NDHA site to be directly lost. On this basis PEA has assessed a level of Substantial Harm; In contrast, the Applicant’s assessment of Low Less than Substantial Harm. Despite the evidence introduced by PEA, the Applicant's reply does not engage with the curtilage-listing evidence at all. Kenningham Hall is simply included in a list of assets said to be “already addressed” in REP4-300, with no direct response to the identification of the grade II curtilage buildings or the physical loss of the NDHA. If curtilage-listed status is correct, the asset should have been assessed under the higher, designated-asset threshold from the outset, not screened through the non-designated route —which alone would justify revisiting the harm level. Silence on a fact capable of overturning the Applicant's own harm rating illustrates that the wider claim of a “robust, case-by-case” assessment has not been tested against contrary evidence, only reasserted.	The Applicant acknowledges that those buildings predating 1948 within the Kenningham Hall farming complex are likely to be curtilage listed. However, whilst they should be treated legally as part of the listing they remain non-designated assets for the purposes of setting assessment where no physical impact is proposed. The setting of a listed building is its surroundings, and the assessment has correctly considered the surrounding historic buildings as part of this assessment. The Applicant is, therefore, confident that the assessment conclusion of lower less than substantial harm is proportionate and appropriate and strongly disagrees with PEA’s assessment. The Applicant again asserts that there are no listed buildings within the Kenningham Hall complex within the Order Limits but acknowledges that some of the buildings within the curtilage of Kenningham Hall are adjacent to a permanent access route defined by the Order Limits. There would be no physical works associated with the permanent access route to pylons or underground cables across the Project. They are proposed rights of access only to allow for any maintenance or refurbishment of the pylons or underground cables as required (**6.4 Environmental Statement Chapter 4 - Project Description [Revision B]**). With regard to the “moated NDHA site”, there is no evidence of a moat on or around the Kenningham Hall farming complex in the Norfolk HER nor arising from available OS mapping. The impact of the Project on potential archaeological remains associated with the non-designated deserted settlement of Kenningham (1010) will be minimised primarily through avoidance and through archaeological excavation where necessary. The pylon bases, temporary haul road, SuDS basins and the wider area of Kenningham deserted settlement as defined by the Norfolk HER to the east of Kenningham Hall have been subject to geophysical survey **6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**. The geophysical survey is to be followed by archaeological trial trenching the results of which will determine whether mitigation is required. There is a robust process in place to ensure the archaeological record is treated appropriately details of which can be found in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**.
5. Same Pattern in Cumulative Harm and the Mitigation Hierarchy On cumulative effects, the Applicant repeats that harms cannot simply be “counted or added together” a point PEA already conceded, without addressing PEA's actual argument, drawn from Historic England's GPA3, that cumulative harm can arise through shared setting, group value or intervisibility (e.g. Ardleigh, Rivenhall, the Waltham conservation areas). The response asserts that group value “has been assessed” but does not show how, for the specific groups PEA identified. On the mitigation hierarchy, the Applicant confirms harm was “identified prior to any balancing exercise,” which restates the policy test rather than answering PEA's point: that under-assessment at the identification stage (as at Kenningham Hall) means the subsequent balancing exercise is built on an unreliable base. The Applicant has consistently failed to address PEA’s key concerns about cumulative harm and under-assessment of harm, which has undermined the balancing exercise as required by section 104 of the Planning Act 2008, section 16 of the Planning (Listed Buildings and Conservation Areas) 1990, and paragraphs 4.1.3 – 4.1.7 of Policy EN-1.	Regarding cumulative harm, as PEA notes, this is not a new point. The Applicant has already addressed this matter in previous submissions and, most recently, in **8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202]**. The Applicant does not agree with the statement that the assessment of group value has not been shown. Indeed, in **6.11.A1 Historic Environment Baseline Report [REP6-061]**, the setting assessment of assets and the assessment of group value are described. As previously explained, the group value of heritage assets has been considered. The Applicant has considered groups of listed structures where the assessment, including consultation responses and listing descriptions, determined that heritage assets were related or had group value. These instances have been identified in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** and referred to as having group value and/or the assessment has specified instances where individual listed structures inform the significance of one another. The assessment has done this in the context of how the setting of these identified groups of listed structures inform their own and each other’s significance. For example, the assessment has considered functional and physical relationships between individual and groups of listed structures and how these relationships contribute to the significance of the listed structures. Setting has been assessed utilising the guidance set out in Steps 1 to 5 of The Setting of Heritage

Matter	NG Response
	Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England, 2017) and outlined in the Project methodology in Annex C of **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]**. Regarding the point on the mitigation hierarchy and alleged under-assessment of harm, the Applicant does not agree with PEA's statement. Whilst PEA maintains that the Applicant's assessment of harm was incomplete, the Applicant's assessment was undertaken in accordance with the methodology adopted for the Project. As already explained, that methodology was discussed repeatedly with the relevant stakeholders, Local Planning Authorities and Historic England from the beginning of the Project and was agreed through that process. In those circumstances, the Applicant does not accept PEA's suggestion that the subsequent balancing exercise is based on an unreliable foundation. The Applicant's position remains that the assessment of harm was carried out in accordance with the agreed methodology, and that effects have been transparently reported. In relation to Kenningham Hall, the Applicant has already provided its response above. Accordingly, the Applicant remains satisfied that the historic environment assessment, including its consideration of cumulative effects and group value, is robust, proportionate and policy compliant, and has no further submissions to make on this matter.
Conclusion Taken as a whole, the Applicant's response fails to demonstrate that PEA's concerns have been rigorously examined and dismissed on their merits; rather, it shows they have simply been recorded and deferred to other parties. Where the record can be checked against physical evidence — as at Kenningham Hall (GII 13730560), or against the photomontages that have been produced, as at the Church of St Mary (GII) 1122253 (HE20), The Examining Authority should treat the Applicant's repeated assurances of a "robust and proportionate" methodology with caution based upon the flawed approach and errors that PEA has consistently raised throughout the entire DCO process.	The Applicant maintains the position set out in this Appendix C and its previous submissions and has no further comments on this matter given the repetitive nature of PEA's submissions.

E.7 Applicant's Response to PEA Deadline 6 Submission Appendix E Landscape Partnership Colne Valley

Table E.6 Applicant's Responses to Deadline 6 Submission Appendix E from Pylons East Anglia **[REP6-229]**

Matter	NG Response
1. At the recent Issue Specific Hearing 4: Environmental Matters, held 25th June 2026, we welcomed the opportunity to explain our assessment of the value, susceptibility to change and sensitivity of the landscape of the Colne River Valley.	Noted
2. For the purposes of understanding the likely landscape and visual effects of the Norwich to Tilbury Project, this landscape has been studied by three independent and professionally qualified Chartered Landscape Architects: Land Use Consultants (on behalf of National Grid); Planscape Consultants Ltd (on behalf of Villages against Pylons), and The Landscape Partnership (on behalf of Essex Suffolk Norfolk Pylons).	Noted
3. All three professionals had considered the likely effects of the development on landscape receptors and visual receptors (people) separately as required by the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). It was apparent that all three reached broadly similar conclusions regarding the sensitivity of this landscape and the views they afford, and the levels of effects that the proposed pylons and their associated infrastructure would impose on landscape character and visual amenity. National Grid's own Landscape and Visual Impact Assessment (LVIA) concluded that many of these landscape and visual impacts would be Significant in EIA terms.	The Applicant notes The Landscape Partnership's recognition of the approach and assessment undertaken in relation to landscape and visual impact assessment (LVIA) for the Project and that The Landscape Partnership are broadly in agreement with the findings of the LVIA.

Matter	NG Response
4. Furthermore, the assessments found that these adverse effects would not be confined to isolated locations or small discrete areas but would extend across an extensive tract of rural countryside and be experienced from numerous publicly accessible viewpoints. 5. In summary, the three independent assessments are aligned in indicating the potential for widespread and significant adverse landscape and/or visual impacts along certain sections of the route. 6. The National Policy Statement for Electricity Networks Infrastructure (EN-5) recognises that, where there is a high potential for widespread and significant adverse landscape and/or visual impacts, feasible alternatives, including undergrounding, may warrant consideration on a case-by-case basis. The policy also requires the decision-maker to be satisfied that sufficient evidence has been provided to support a decision on whether undergrounding is or is not appropriate.	As point of clarification the Applicant does not take the view there is a high potential for widespread and significant adverse landscape visual impact in the Colne Valley. The Applicant has responded to similar comments made in REP6-175 by Aldham Parish Council within **8.4.16 Applicant's Comments on any Further Information or Submission Received by Deadline 6 [Revision A]**.

E.8 Applicant's Response to PEA Deadline 6 Submission Appendix F The Green Book and its relevance to the Norwich to Tilbury project

Table E.7 Applicant's Responses to Deadline 6 Submission Appendix F from Pylons East Anglia **[REP6-229]**

Matter	NG Response
[Applicant note: this report is summarised below, please refer to REP6-229 for full document] The report re-emphasises the view of PEA that the HM Treasury Green Book methodologies should be applied to the appraisal and evaluation of alternative options for the Norwich to Tilbury Project and other electricity infrastructure project. It states that this position is reflected in recent developments in policy and legislation including: • the Environmental Principles Policy Statement (EPPS), under the Environment Act 2021 • the November 2023 and October 2025 versions of NPS EN-1 referring to the Enabling A Natural Capital Approach (ENCA) tool for measuring natural capital assets and ecosystem services, which is a Green Book tool • the 2023 version of the Appraisal of Sustainability for the Energy NPSs • the updated Green Book in 2026 which refers to the EPPS • the mandate for public bodies including DESNZ, NESO and Ofgem to fully adopt Green Book methodology The report provides relevant extracts of the documents listed above and identifies examples of how the Green Book has been used in other planning decisions, stating that it should therefore be used in relation to Norwich to Tilbury. A key example provided is the Heathrow Expansion Appraisal Report produced by Department for Transport. The report states that there are no legitimate reasons for not fully adopting the Green Book and associated natural capital methodologies, pointing to the importance of natural capital in the context of depletion of nature and the need to deliver nature recovery and other social/environmental benefits alongside economic growth.	The Applicant acknowledges the ongoing position of PEA in relation to the Green Book, which has been stated repeatedly through Examination. The Applicant has responded to this position when raised, most recently in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**, page 9. For ease of reference, this response is replicated below: *To be clear, there is no requirement to use the Treasury Green Book. The Applicant acknowledges the ongoing position of Pylons East Anglia and repeated request for HM Treasury Green Book Analysis. The Applicant has consistently reiterated its position that the Treasury Green Book is not relevant to its projects. It therefore rejects the entirety of the analysis referred to in this comment.* *For ease of reference, the Applicant has previously stated in page 15 of **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]:** 'the Treasury Green Book … provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission. There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. National Grid Electricity Transmission is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.'* *The Examining Authority may also find it helpful to note the positive decisions for similar projects over the last 12 years, none of which have required consideration of the Treasury Green Book. Those projects include Hinkley C Connection Project, the Richborough Reinforcement Project, Yorkshire Green, and Bramford to Twinstead Reinforcement.* The Applicant maintains the position as stated in previous submissions. The Applicant has seen nothing additional in the detailed report provided in Appendix F of the PEA Deadline 6 submission to alter the Applicant's position. To assist the Examination further, the Applicant refers to further legal submission at Annex A.

Annex A – Legal Review and Rebuttal of Treasury Greenbook Case Arguments

NGET - NORWICH TO TILBURY

OPINION ON THE APPLICATION OF THE HM TREASURY GREEN BOOK TO THIS DCO PROCESS

1 INTRODUCTION

1.1 On behalf of the Applicant, we provide a review and rebuttal of Pylons East Anglia ("PEA")'s Deadline 6 Green Book legal representations.

1.2 PEA has made further submissions in relation to this Application in its Deadline 6 Submission, Appendix F [REP6-229], relying on the opinion of Charles Banner KC[1] dated 4 July 2023.

1.3 The Charles Banner KC Opinion is used to support PEA's contention that the HM Treasury Green Book (also known as the Green Book) applies to and is a mandatory consideration in the context of the Secretary of State's determination of this DCO Application. PEA claim that:

(a) where the relevant National Policy Statements engage matters to which the Green Book relates, the use of the Green Book and its supplementary business case guidance must be used;

(b) the Green Book is a material consideration in the section 104(7) planning balance; and

(c) a failure by the Examining Authority or the Secretary of State to have regard to it in either of these contexts would constitute an error of law.

1.4 None of these contentions are new and each is refuted for the reasons set out below.

2 THE GREEN BOOK DOES NOT APPLY TO DEVELOPMENT CONSENT ORDER ("DCO") DECISIONS

2.1 The Green Book (both the 2023 version current at the time of the DCO application and the 2026 version) is and has always been a tool for use by Ministers and public servants when government policy is being formulated.

2.2 The introduction to the 2023 version of the Green Book (current at the time of the DCO application) is clear about its purpose. It states as follows (our emphasis added):

"*The Green Book is guidance issued by HM Treasury on* ***how to appraise policies, programmes and projects. … Appraisal of alternative policy options is an inseparable part of detailed policy development and design. This guidance concerns the provision of objective advice by public servants to decision makers, which in central government means advice to ministers. … The guidance is for all public servants concerned with proposals for the use of public resources****, not just for analysts. The key specialisms involved in public policy creation and delivery, from policy at a strategic level to analysis, commercial strategy, procurement, finance, and implementation must work together from the outset to deliver best public value. The Treasury's five case model is the means of developing proposals in a holistic way that* ***optimises the social / public value produced by***

[1] ISH 1 Panel: how should we identify you in this process. Charles Banner KC: During this process, Charles Banner KC would be appropriate.

***the use of public resources**. Similarly, there is a requirement for all organisations across government to work together, to ensure delivery of joined up public services. **The Green Book is not a mechanical or deterministic decision-making device**. It provides approved thinking models and methods to support the provision of advice to clarify the social – or public – welfare costs, benefits, and trade-offs of alternative implementation options for the delivery of policy objectives*."

2.3 The 2026 version of the Green Book does not alter that position. The same principles set out above (and commented in more detail below) continue to run through the 2026 Green Book.

2.4 It is clear from the Green Book that it is guidance to **public servants** advising Ministers **on policy options** – including those relating to projects – that involve the use of **public resources**. The Green Book (2023 and 2026 versions) are mandatory for **UK government departments**. PEA's own evidence supports this approach – their Appendix F is built on examples of and references to public authorities making decisions on policy.

2.5 That is the Green Book's purpose and its proper domain, and that is confirmed not merely by its own terms but by settled legal authority.

2.6 In *R (People and Planet) v HM Treasury* [2009] EWHC 3020 (Admin), a challenge arising from the Government's intervention in Royal Bank of Scotland following the financial crisis, Sales J held at [25] that policy-makers "*retain a large measure of discretion as to what considerations they may take into account or leave out of account when conducting an assessment in accordance with the Green Book in formulating policies and taking decisions*," going on to confirm that the Green Book "*left HM Treasury a wide discretion to decide what investigations it thought were required to inform itself about relevant factors*." The reference in that passage to "*formulating policies and taking decisions*" must be read in its context: Sales J's analysis in *People and Planet* concerned the formulation of government policy regarding UKFI[2].

2.7 Sales J's full judgment at [25] says:

> *"25. In my judgment, [the above] passages underline the point that policy-makers retain a large measure of discretion as to what considerations they may take into account or leave out of account when conducting an assessment in accordance with the Green Book in formulating policies and taking decisions. The Green Book left HM Treasury with a very wide discretion to decide what factors to treat as relevant or weighty or not for the purposes of formulating its policy in respect of UKFI, in accordance with ordinary principles of public law (as illustrated by CREEDNZ v Governor General [1981] 1 NZLR 172 , 183; Re Findlay [1985] AC 318 , 333-334; and Tesco Stores Ltd v Secretary of State for the Environment [1995] 1 WLR 759). The Green Book also left HM Treasury a wide discretion to decide what investigations it thought were required to inform itself about relevant factors applying the guidance in Secretary of State for Education and Science v Tameside MBC [1977] AC 101."*

2.8 There is nothing in that judgment to suggest any requirement to apply the Green Book when a Secretary of State is determining an individual DCO application brought by a privately regulated business under the Planning Act 2008.

2.9 Indeed, to the extent that the Green Book has any relevance at all to matters relevant to this Examination, that relevance is to the formulation of government policy, not

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[2] According to Gov.UK, UK Financial Investments Limited (UKFI) manages the government's investments in the Royal Bank of Scotland (RBS), Lloyds Banking Group (Lloyds) and UK Asset Resolution Ltd (UKAR).

to the taking of individual DCO decisions or the application of adopted policy to those DCO decisions. If a Green Book-based challenge to the consideration of alternatives were ever to be mounted, it should properly have been directed at the designation of the relevant National Policy Statement and not at this Examination.

2.10 To bring the Green Book within the category of a mandatory material consideration capable of having a bearing on a DCO determination (and by extension that must as a matter of logic extend to all planning decisions (by all local planning authorities) including those under the Town and Country Planning Act 1990), PEA would need to satisfy the test established by the Court of Appeal in *DLA Delivery Ltd v Baroness Cumberlege of Newick* [2018] EWCA Civ 1305. Under that test, a consideration is material either because statute makes it so, or because it is "*so obviously material to a decision*" that "*regard must be had to it*". Neither limb is met. The Planning Act 2008 says nothing about any requirement to have regard to Green Book guidance. To our knowledge, no DCO decision made to date has factored in the Green Book guidance as a material consideration, nor has any judicial review challenge been brought on that basis in respect of any DCO decision. We note that the examples relied upon by PEA regarding the use of the Green Book in planning decisions (section 8 of Appendix F) do not relate to decisions on applications for development consent under the Planning Act 2008.

2.11 On the second limb of the *DLA Delivery* test, the "so obviously material" criterion cannot be sustained when the guidance itself and every case that has considered it confine the Green Book's relevance to the making of government policy and not to individual decision-taking. The proposition that guidance which courts have consistently treated as a policy-making instrument for government ministers is somehow so obviously material to the determination of a private developer's DCO application that non-compliance constitutes a legal error is, with respect, unsustainable.

3 THE SUBSEQUENT DEVELOPMENTS PEA RELIES UPON DO NOT ALTER THE ANALYSIS

3.1 PEA's position is that the Environmental Principles Policy Statement ("EPPS") binds the making and revising of policy; NPS EN-1 and EN-5 are the relevant policies to this project; those policies contain the appropriate natural capital, ENCA, and Environment Act references; and therefore the project decision must properly apply those NPS requirements.

3.2 None of these developments advances PEA's legal case.

3.3 The EPPS point is disposed of by reference to the statute itself. Section 17(2) of the Environment Act 2021 provides in terms that a "*policy statement on environmental principles*" is a statement explaining how the environmental principles should be interpreted and proportionately applied by **Ministers of the Crown when making policy**.

3.4 The statutory language is unambiguous: the duty attaches to Ministers making policy, not to private project promoters and not to the Secretary of State when exercising a quasi-judicial function in determining an individual DCO application. PEA relies on the Court of Appeal's decision in *R (Rights: Community: Action Ltd) v Secretary of State* [2025] EWCA Civ 990, in which the court confirmed that the EPPS duty to have "due regard" applies throughout the stages of making a policy - when a policy is being developed, when it is being formulated, and when different policy options are being considered - and that a later EPPS assessment cannot cure an earlier failure at a material stage. That case does not assist PEA. It concerned a Ministerial Statement about government policy and Holgate LJ's analysis throughout is directed at the

obligations of Ministers engaged in the making of policy. Holgate LJ said (at [85])(our emphasis added):

> *"85. Thus, the duty applies at a number of stages* ***in the "making" of a policy****. For example, the duty to have "due regard" to the EPPS applies* ***when a policy is being developed*** *and not simply at the point when a policy is adopted.* ***It applies when a policy is being formulated and different policy options are being considered.*** *Accordingly, it is necessary to be careful in the language used to deal with a situation where there was no regard to the EPPS at one material point but an EPPS assessment has been carried out subsequently".*

3.5 The Applicant is not a Minister. It is not making policy. The EPPS duty does not attach to it, and nor does it attach to the Secretary of State when performing the quasi-judicial function of determining an individual application under the Planning Act 2008.

3.6 PEA further relies upon the updated Green Book of 5 February 2026, which PEA says instructs practitioners to note the statutory duties around the EPPS and biodiversity so that consideration of the natural environment is embedded in proposals from the outset.

3.7 This too fails to advance PEA's case.

3.8 The 2026 Green Book addresses "practitioners" in government. These are quite obviously public servants appraising public spending decisions; they are not private regulated businesses making DCO applications.

3.9 PEA refers[3] to other HM Treasury guidance stating its applicability to "*infrastructure spending and interventions that involve the use of public money or have a societal impact*". PEA argue that because the Applicant's proposed infrastructure has "*societal impact*" it therefore necessarily follows that the Green Book guidance applies based on this aspect alone.

3.10 In our view, this reading is incorrect. The supplementary guidance is addressed to government practitioners appraising public expenditure decisions; the reference to "societal impact" contextualises the breadth of costs and benefits that should be considered within that public expenditure appraisal framework. It is not an extension of that framework to all privately promoted infrastructure with any societal impact whatsoever.

3.11 On PEA's reading, virtually every significant infrastructure project in the country would be subject to mandatory Green Book compliance; such a conclusion finds no support in statute, policy, or authority. If that were the requirement then EN-1 would say so, but it does not.

3.12 PEA argues that unless the Examining Authority, and subsequently the Secretary of State, are provided with an appropriate Green Book appraisal they are not equipped with information critical to making the correct decisions on proposals. That argument conflates the Green Book as a specific prescribed methodology with the broader real and proper question of whether the Examining Authority has sufficient information to discharge its functions under the Planning Act 2008 and the relevant NPSs. The Examination has been conducted in accordance with the correct statutory framework throughout, and the Applicant's evidence provides a comprehensive basis for the Secretary of State's determination.

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[3] PEA Deadline 6 submsison, Appendix F, Section 7 [REP6-229]

4 UP-TO-DATE COST INFORMATION

4.1 PEA argues in its Deadline 6 submissions [REP6-229] that there is no breakdown of project costs from the Applicant, despite requests from the outset in 2022, and therefore it is not known whether fair comparisons are being made between alternatives. That assertion is factually wrong and has been wrong throughout the Examination. A full and transparent cost model underpinning the options appraisal has been available throughout in the 2025 version of the Strategic Options Backcheck and Review [APP-355] and its cross references to the economic appraisal attached to the 2024 version of the Strategic Options Backcheck and Review (which is itself appended to APP-355) as well as the earlier 2023 version [APP-357]. The economic appraisal sets out in auditable detail how option appraisal costs were evaluated across all relevant technology types. These figures have since been reviewed and updated in answers to questions throughout the Examination.

5 THE PROPERTY VALUE AND NATURAL CAPITAL ARGUMENTS

5.1 PEA estimates that the current HVAC proposal would result in an additional circa £1.6[4] billion impact on businesses due to disruption relative to an underground HVDC solution. The reliability and independence of those figures is challenged.

5.2 PEA's assertion that the Green Book is "the only mechanism"[5] by which such impacts can be assessed is simply wrong: landscape and visual impacts, socio-economic effects, ecological impacts, and land impacts have all been assessed throughout this Examination through the established EIA and NPS assessment framework. The Secretary of State is not required to monetise these impacts within a Green Book framework, and it is telling that not a single authority requires it to be done in the context of a DCO decision made under the Planning Act 2008.

6 CHARLES BANNER KC'S OPINION DOES NOT ESTABLISH LEGAL DEFECT

6.1 Charles Banner KC maintains that the Green Book is a material consideration for the section 104(7) planning balance and that non-application constitutes an error of law. That opinion has been comprehensively answered by the Applicant's leading counsel throughout this Examination and, with respect, remains wrong for the reasons set out above and before. The Applicant's legal response to Charles Banner KC's legal opinion is set out in Appendix D3 of document 8.4.14 [REP6-114].

6.2 Even accepting, for the sake of argument, that the Green Book could in principle be a material consideration in a DCO determination - which the Applicant firmly denies - the *People and Planet* authority establishes that even those to whom the Green Book properly applies (Ministers making policy) retain "*a large measure of discretion as to what considerations they may take into account or leave out of account*." The proposition that guidance conferring a wide discretion even upon those it properly binds somehow imposes a strict obligation upon a private project promoter who is outside its proper scope altogether cannot, in our view, be sustained.

6.3 PEA maintains that the most compelling use of the Green Book on this project is for the balanced analysis of alternatives for best outcomes. That characterisation confirms that PEA's underlying concern appears to relate to the outcome of the alternatives appraisal, rather than any identifiable legal defect in the process. Disagreement with outcome is not a legal error.

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[4] Figures taken from PEA Deadline 6 submsison, Appendix F, Section 6 on page 12 [REP6-229]

[5] PEA Deadline 6 submsison, Appendix F, heading on page 12 [REP6-229]

7 THE APPLICANT'S ALTERNATIVES APPRAISAL IS ROBUST, TRANSPARENT AND COMPLIANT WITH APPLICABLE POLICY

7.1 The Applicant's position, maintained without deviation from the pre-application stage and throughout the Examination, is that the Green Book provides guidance on the interpretation by public servants of public spending, assets and resources, that it is not relevant to the Applicant as an Ofgem-regulated business, and that there is no requirement under the Planning Act 2008 to include a Green Book assessment in a DCO application.

7.2 Furthermore, consideration of project costs and the regulatory funding settlement is the subject of a separate Ofgem regulatory process, and it is neither a legal requirement nor appropriate for the Planning Inspectorate, the Examining Authority, or the Secretary of State in their remit under the Planning Act 2008, to seek to duplicate that separate regime.

7.3 A full and transparent cost model underpinning the options appraisal has been available throughout the Examination in the Strategic Options Backcheck and Review [APP-355] and its Appendix D: Economic Appraisal, setting out in auditable detail how option appraisal costs were evaluated across all relevant technology types. That methodology has been tried and tested through numerous previous projects, formal examination processes, and decisions by the relevant Secretary of State.

8 SUMMARY AND CONCLUSION

8.1 PEA believes in the importance of applying HM Treasury Green Book methodologies to the appraisal and evaluation of alternative options for the Norwich to Tilbury project, and indeed other electricity infrastructure projects, and has articulated this view throughout the Examination process. That belief does not constitute or create a legal obligation. The Applicant's response to PEA's Deadline 6 Green Book representations can be summarised in four propositions, each of which is well-founded and has been consistently maintained throughout this Examination.

8.2 First, the Green Book does not apply to DCO decisions as a matter of law. It is guidance for Ministers and public servants formulating government policy. The Planning Act 2008 imposes no Green Book obligation on project promoters or on the Secretary of State when determining an individual DCO application. Every subsequent legal instrument upon which PEA relies (the EPPS under section 17(2) of the Environment Act 2021, EN-1's references to Environment Act duties, and the 2026 Green Book update) either addresses Ministers making policy (not private project promoters or DCO decision-makers), or post-dates the application acceptance in a way that cannot impose retrospective obligations on the Applicant's pre-application work and now the determinations on it.

8.3 Second, even if the Green Book were capable of constituting a material consideration in a DCO context - which is firmly denied - PEA cannot satisfy the *DLA Delivery* test. There is no statutory mandate in the Planning Act 2008, and the Green Book cannot be "so obviously material" that it must be considered when every authority addressing it confines it to the making of government policy. *People and Planet* establishes, further, that even those properly subject to the Green Book retain a wide discretion as to how it is applied. PEA's Deadline 6 submissions add no new legal authority capable of displacing the Applicant's position.

8.4 Third, PEA's own cost table is not reliable evidence and should be accorded little or no weight. It is the work of an interested campaign group, not an independent expert. The Examination has been given limited information on which to judge the level and rigour of any independent testing.

8.5 Fourth, the Applicant has produced a transparent, auditable, and comprehensive alternatives appraisal, covering all relevant technology options, set out in the Strategic Options Backcheck and Review [APP-355], which has been available to all parties throughout this Examination and has been tested rigorously throughout. PEA's dissatisfaction with the conclusions of that appraisal is not a legal argument, nor does it represent a legal error; it is simply a judgmental disagreement as to outcome.

8.6 The Secretary of State is entitled and required to determine this application on the basis of the statutory framework, the relevant NPSs, and the evidence before the Examination and not on the basis of a methodology that has no legal basis in this context and whose quantitative outputs have been produced by an interested party and have not been subject to independent verification.

8.7 The Applicant has carefully reviewed PEA's submissions. They do not raise matters beyond those that have been consistently and fully addressed throughout this Examination and as such should carry no material weight in the determination of this DCO application.

Russell Harris KC, Landmark Chambers, July 2026

Bryan Cave Leighton Paisner LLP, July 2026

Appendix F. Applicant's Responses to ARU Writtle [REP6-134]

nationalgrid

Appendix F
Applicant's Responses to ARU Writtle [REP6-134]

F.1 Introduction

F.1.1 This appendix provides a response to the Deadline 6 submission by ARU Writtle **[REP6-134]**. In doing so, it responds to question 2.1(a) of the Rule 17 Request **[PD-031]** made by the ExA on 14 July 2026, which states in relation to ARU Writtle's Deadline 6 submission (amongst others): '*Respond to the specific matters raised in the following deadline 6 submissions and update the ExA on your intended actions to resolve outstanding issues'*.

F.1.2 Given the Applicant's previous detailed responses to earlier submissions by ARU Writtle during Examination, this response focuses on new matters raised via the Deadline 6 submission. Primarily this relates to

i. the Applicant's proposal to reclassify Plot 8/42 as "Class 8" land and

ii. ARU Writtle's request for four specific Protective Provisions or an equivalent DCO requirement.

F.1.3 Whilst this response is focused on the new matters, the Applicant has reviewed in full the Deadline 6 submission [REP6-134]. In light of the content of the submission, and in particular the witness statements, the Applicant considers it appropriate to reiterate the limited extent of potential impacts on the ARU Writtle site, as set out in its previous response to ARU Writtle at Deadline 5, **8.4.11.1 Applicant's Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2 [REP5-193**]. As set out in paragraph 2.5.8 of the response in REP5-193, and illustrated with a figure, the Project oversails a very small proportion of the western paddock, whilst paragraph 2.6.4 confirms that the Environmental Statement Chapter 15 [APP-265] reports no significant effects to the educational facility as a result of the Project, with minor adverse and temporary effects during construction only.

F.1.4 As concluded in the Applicant's Deadline 5 submission **[REP5-193]**, the temporary and non-significant effects to ARU Writtle must be situated within the context of the critical national priority (CNP) policy of National Policy Statement (NPS) EN-1. As stated in paragraph 2.7.5 of REP5-193: '*With the mitigation measures as proposed and secured through the draft DCO, the Applicant's position is that the temporary effects to ARU Writtle are proportionate within the context of CNP infrastructure and do not outweigh the urgent need for the Project under NPS policy.*'

F.2 Reclassification of Plot 8/42

Update at CAH3

F.2.1 The Deadline 6 submission by ARU Writtle highlights the update provided by the Applicant regarding plot 8/42 in respect of compulsory acquisition, in which the Applicant confirmed that the plot is no longer required for the Project. ARU Writtle has identified this update as representing a flaw in the Applicant's draft DCO and a contradiction in respect of the Applicant's earlier position in Examination. The Applicant refutes this assertion and refers to section 2.2 of its submission at Deadline 5 **[REP5-**

193] which clearly explains the justification for the temporary possession of plot 8/42 as proposed at that time. It also explained that the Applicant was actively seeking to find a solution in direct response to concerns as raised by ARU Writtle through the Examination process, in which agreement in principle with Essex County Council (ECC) on three alternative access strategies would remove the need for plot 8/42. At that time, the agreement had not yet been received.

F.2.2 The three alternative access strategies are summarised below, further details are provided with Document: **8.4.11.1 Applicant's Response to ARU Writtle [REP4 - 348] and ExQ2 CA 2.1 and HW 2.22.1 and HW 2.2 [REP5-193].**

- Option 1: This option proposes the construction of a new temporary, non-formal access point from Newney Green directly into Writtle College horse paddocks at the scaffold tower location. This approach removes the need for construction vehicles to access the site through the Equine Facility.
- Option 2: This option utilises the proposed construction haul road to the south of Newney Green, with a new temporary crossover point across Newney Green.
- Option 3: This option involves removing the scaffold requirement entirely and instead applying for a long closure of Newney Green to facilitate overhead line stringing operations directly from the highway. Not using scaffolding and netting would require the conductors to be laid at ground level directly across Newney Green. This method is expected to take approximately 12 weeks, during which Newney Green would be closed for all public access.

F.2.3 At CAH3, the Applicant was able to update all present on a very recent development that ECC had confirmed agreement in principle to two of the three options (Options 1 and 2), such that the Applicant could remove the sought powers of temporary possession over Plot 8/42 from the draft DCO.

Representation of plot 8/42 in DCO plans and drawings

F.2.4 The ARU Writtle submission argues that following confirmation from the Applicant that plot 8/42 is no longer necessary for the Project, the 'perimeter red line' – taken to mean the Order Limits – should be reduced to exclude the plot from all drawings that will form certified plans under the DCO if granted. ARU Writtle further provide a list of documents on pages 3 to 6 of the Tom Newcombe Witness Statement (pdf page 300 to 303 of REP6-134) that it contends should also be updated to remove reference to plot 8/42, including the draft DCO and Book of Reference.

F.2.5 As noted by ARU Writtle, the Applicant committed at CAH3 to update the plans at a future deadline in order to amend Plot 8/42 as shaded white rather than yellow, reclassifying it to "Class 8 - Land not subject to powers of acquisition nor temporary use". The Applicant intends to submit revised plans at Deadline 8. The proposed revisions are consistent with the existing approach adopted within the Land Plans.

F.2.6 Furthermore, the Applicant has set out clearly its justification for the use of 'white land' in response to ExQ1 CA1.2 at Deadline 3, in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, this identifies that:

- There is precedent in other DCOs which have been made whilst containing land within the Order Limits in which no powers of compulsory acquisition or temporary possession are sought;

- Class 8 land is clearly described as not being subject to powers of acquisition or temporary use;
- Amending the Order Limits to remove Class 8 land would not be proportionate, necessary or appropriate given the above, and nor would there be sufficient time in Examination to undertake a formal change application.

F.2.7 The matter was discussed further at Issue Specific Hearing 3 (CAH3) and as confirmed in the post-hearing update provided by the Applicant in item 5.1c in **8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117],** the Applicant has further clarified the position of Class 8 land in the DCO through Revision F submitted at Deadline 6:

*"The Applicant has updated the **3.1 Draft DCO [Revision F]** to:*

a) amend the definition of "Order land" to read: "means the land shown on the land plans and described in the book of reference excluding the white land"; and

b) add a definition of "white land" that reads "means the land uncoloured (white) and identified as 'Class 8 - Land not subject to powers of temporary acquisition nor temporary use' on the land plans and recorded as Class 8 in table 2.1 of the book of reference"."

F.2.8 Given the Applicant's position regarding the Order Limits and Plot 8/42, no changes to other documentation such as the draft DCO or the Book of Reference is required. The Applicant reiterates to ARU Writtle that the inclusion of the plot as Class 8 land within the DCO is sufficient in ensuring that it is not subject to any powers of acquisition or temporary use, as clearly and explicitly stated in both the Land Plans and the Book of Reference.

F.3 Request for Protective Provisions

F.3.1 ARU Writtle have requested four protective provisions, or equivalent requirement. The nature of each provision requested and the Applicant's response is provided below.

Requested Provision	Proposed Provision Wording	Applicant response
the NGET Micro-Siting Gateway Provision A notional micrositing 'gateway' outside of the paddock areas immediately South of the footpath within Plot 8/29; through which can traverse the NGET overhead electrical lines simultaneously inside of the Westernmost extent of the Limits of Deviation within that Envelope. This micro-siting gateway ensures that the law relating to compulsory purchase and relevant guidance are complied with and the continuation of the safe functioning of ARU Writtle Educational Establishment.	For the protection of ARU Writtle, in relation to any electrical transmission line in Works No.17, Part V of the development consent order cannot apply to the extent of Fields 4, 5, 6 and 7 in Plot 8/37 and Plot 8/29) situated to the South of the footpath running East [at grid reference [insert]] from Newney Green Lane.	The Applicant does not accept that the proposed provision is necessary or appropriate. The Applicant has previously responded in detail to ARU Writtle's concerns regarding the location of the overhead line, the scope for micrositing and the potential effects on the western paddock. As set out in the Applicant's Deadline 5 response, although the Applicant cannot commit to micro sitting at this stage, alternative routeing has been considered in the vicinity of ARU Writtle. The Applicant's position remains that, with some potential for micrositing within the Order Limits to position the alignment as far to the north-west as practicable, there is no feasible alternative within the Order Limits which would avoid all interaction with ARU Writtle land. Alternatives outside the Order Limits have also been considered but are less preferred, including because they would transfer or increase effects elsewhere, including in relation to residential amenity, listed buildings and woodland loss. The requested provision would, in effect, remove or materially restrict the powers sought over parts of Plot 8/29 and Plot 8/37 and would constrain the detailed design and

Requested Provision	Proposed Provision Wording	Applicant response
		delivery of Works No. 17 beyond what is necessary or justified. The draft DCO already provides the appropriate framework for the authorised development to be delivered within the Order Limits and Limits of Deviation, with detailed design to be developed within those parameters and subject to the controls secured through the DCO. The Applicant therefore does not consider that a bespoke protective provision, which would predetermine the final alignment by excluding particular paddock areas from Part V powers, is justified. The Applicant also does not accept that the requested provision is required to address microshock concerns. As explained in the Applicant's previous response, the Project has applied the principles of the Government's Code of Practice on microshocks as a precautionary measure. Span TB165 to TB166 has been designed with additional conductor clearance, reducing the maximum calculated electric field over the western paddock to 2.8 kV/m, which is substantially below the 5 kV/m reference level identified in the Code of Practice. The areas of highest electric field are limited in spatial extent, and no areas on ARU Writtle's land would exceed the 5 kV/m level. These embedded measures are secured through the Outline Code of Construction Practice, commitment GG02.

Requested Provision	Proposed Provision Wording	Applicant response
		Accordingly, the Applicant considers that the existing DCO controls, the retained micrositing flexibility within the Order Limits, and the embedded EMF mitigation already provide an appropriate and proportionate response. No additional protective provision or equivalent requirement is appropriate or necessary.
the Eastern Power Networks plc Micro-Siting Below Ground Gateway Provision The creation of a sub-surface micro-siting notional 'gateway': below the ground level surface of the paddock areas immediately South of the stream footpath within Plots 8/27, 33 and 36; through which can traverse by horizontal direct drilling the electrical lines of Eastern Power Networks plc (as the sole licensed distributor) simultaneously. This micro-siting gateway ensures that the law relating to compulsory purchase and relevant guidance are complied with and the continuation of the safe functioning of ARU Writtle Educational Establishment.	For the protection of ARU Writtle, Part V of the development consent order cannot apply to the extent of Fields 8, Park 1 and Park 2 (identified as Plot 8/27 and Plot 8/33 and Plot 8/36). Eastern Power Networks plc may below a depth of 1m beneath the ground surface level of the said Plots install and keep an electrical distribution line inside of the Order Limits as they relate to ARU Writtle, unless otherwise agreed in writing by ARU Writtle.	The Applicant does not consider the requested protective provision necessary or appropriate. The provision relates to apparatus operated by Eastern Power Networks plc, the licensed distribution network operator within the UK Power Networks (UKPN) group. The Applicant considers that any diversion, protection or accommodation of existing apparatus can be addressed through the statutory undertaker protections already included within the draft DCO. It would not be appropriate to prescribe a specific underground diversion corridor, installation methodology or detailed engineering solution through the DCO, as these matters are properly addressed through the detailed design process . The Applicant also notes that concerns regarding the safety of the operational line, including references to micro-shocks, do not justify the additional provision sought. The operational line must comply with the applicable statutory and industry safety requirements. Further, any temporary construction-related matters, including the management of ground

Requested Provision	Proposed Provision Wording	Applicant response
		conditions and compaction, would be controlled through the measures secured by the Code of Construction Practice and associated construction management processes. No additional protective provision is therefore considered necessary. The Applicant also does not agree with ARU Writtle's characterisation of the evidence provided by UKPN at CAH3. Whilst UKPN confirmed that it continues to seek voluntary agreements with affected landowners, it also confirmed that it is pursuing compulsory acquisition powers as a necessary backstop should agreement not be reached. UKPN categorically described this as a "twin-tracking" approach, whereby negotiations continue alongside the promotion of compulsory acquisition powers in the usual manner to ensure delivery of the Project if voluntary agreements cannot be secured. ARU Writtle's suggestion that UKPN is not seeking compulsory acquisition powers, or has not identified a need for them, is therefore inconsistent with UKPN's evidence at CAH3 and its subsequent submissions at Appendices A and B of the **8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [REP6-116]**. That evidence and those submissions clearly explain both the basis for the powers sought and the

Requested Provision	Proposed Provision Wording	Applicant response
		circumstances in which they may be required. In relation to ARU Writtle specifically, UKPN explained at CAH3 that an existing 11kV distribution line crosses the proposed development alignment and requires diversion via undergrounding. UKPN confirmed that this is the reason rights are required over ARU Writtle's land and that discussions regarding access and routing options remain ongoing. The need for rights to facilitate the diversion of existing electricity distribution infrastructure has therefore been clearly identified by the statutory undertaker responsible for the apparatus. The Applicant further considers that the statutory tests for the acquisition of rights are met. The rights sought are required to facilitate the diversion of existing electricity infrastructure necessary to enable construction and operation of the authorised development, and there is a compelling case in the public interest for their acquisition should agreement not be reached. The Applicant is seeking only those rights that are reasonably required for this purpose and continues to pursue a negotiated solution in parallel.
the Scaffolding Provision	For the protection of ARU Writtle, in relation to the construction of Works No.17, Part V of the development consent order cannot apply to the extent of Fields 4, 5, 6 and 7 (identified as Plot 8/29, Plot 8/37 and Plot 8/38).	The Applicant does not accept the request for this provision.

Requested Provision	Proposed Provision Wording	Applicant response
The absence of scaffolding situated on paddock ground surfaces of ARU Writtle adjacent to Newney Green Lane highway during the limited period of 4 hours contended by NGET for closure of the use of that highway during its cable installation between two pylons inside of the construction site of the said Envelope		The Applicant set out a detailed response at Deadline 5 within Document: **8.4.11.1 Applicant's Response to ARU Writtle [REP4- 348] and ExQ2 CA 2.1 and HW 2.22.1 and HW 2.2 [REP5-193]** setting out the status in this location and 3 options for mitigating the APs concerns. This concluded in paragraph 2.2.4 that *"The Applicant is working with its construction partners and Essex County Council to confirm the feasibility and acceptability of one of the above options, with a view to removing the need to utilise Plot 8/42. However, until this approach is agreed with Essex County Council, and becomes an option on which the Project may rely with certainty, the Applicant considers that the inclusion of Plot 8/42 for temporary possession must be retained on a precautionary basis and remains justified."* Such confirmation from Essex CC Highways was received during the CAH3 hearing, with agreement to keep Options 1 and 2 open for further consideration. The Applicant is therefore reclassifing Plot 8/42, as described in section 1.2.6, and added access from the Newney Green highway consistent with Options 1 and 2 for access to scaffolding. Which would mean only a short term road closure of a 2hrs or overnight works.

Requested Provision	Proposed Provision Wording	Applicant response
		The AP's requested provision which would result in no erection of scaffolding on their land, which aligns to Option 3 has been ruled out by Essex CC Highways due to the impact on their highway network of the resultant closure of approximately 12 weeks. The Applicant is seeking TRO powers which include for the temporary stopping up of Newney Green. The primary purpose of seeking these powers is for the closure of Newney Green for two short durations (typically this may take place over a 2 hour period) to facilitate safe installation and removal of netting across the carriageway consistent with Options 1 and 2. This allows conductor stringing works to safely be carried out over the active highway. The Applicant would like to clarify that this detail has appears to have been misstated in the AP's requested provision and in paragraph 115 of the AP's written post-hearing submissions [REP6-134], with a clear distinction needing to be made between the public highway closure duration associated with erecting the scaffold and netting (approx. 2 hours), and the far longer duration for which the netting is required to be in place for to enable conductor stringing. Additionally, Newney Green is a popular walking and cycling route, and forms part of the National Cycle Route 1. The duration of this closure would be significantly longer than that proposed within the Application.

Requested Provision	Proposed Provision Wording	Applicant response
the ARU Safe Crossing Provision The provision of clear express terms to ensure the safe crossing of Cow Watering Lane by ARU horses, students and staff during the diversion by NGET of traffic along that Lane and its use by NGET construction vehicles	For the protection of ARU Writtle, no diversion of traffic along Cow Watering Lane can occur without suitable traffic safety measures being agreed with Essex County Council and carried out by the Applicant.	The Applicant does not accept the request for this provision. Existing control measures are already in place, including with Essex County Council as part of the Permit Scheme, the use of which is applied by Article 12 (Application of the Permit Schemes) of the draft DCO. Through the approach described in item iii above, the Applicant is able to significantly control the timing and reduce the duration for which a diversion would be in place for Newney Green to approximately 2 hours. These closures and resultant diversions could be planned and scheduled out of periods of concern for ARU Writtle where practicable. A 12 week duration closure of Newney Green would not be possible, as indicated by Essex CC Highways. As previously stated at **Deadline 5 within Document: 8.4.11.1 Applicant's Response to ARU Writtle [REP4- 348] and ExQ2 CA 2.1 and HW 2.22.1 and HW 2.2 [REP5-193],** given the short duration and opportunity to manage the timing of the closures, the Applicant does not consider that pedestrian activated TO/15 control measures as proposed by ARU Writtle College's transport consultant to be a reasonable and proportionate traffic management regime for the crossing point on Cow Watering Lane. Construction of such infrastructure would itself be likely to generate greater impacts

Requested Provision	Proposed Provision Wording	Applicant response
		than those which they are intended to mitigate against. Where road closures are required, the Main Works Contractor will assess the diversion routes and identify any traffic management measures required on these to facilitate their safe operation. This may include measures at the Equine Facility crossing point on Cow Watering Lane, depending on the duration and timing of the closure. All traffic management measures will be discussed and agreed with Essex County Council as part of the Permit Scheme, the use of which is applied by Article 12 (Application of the Permit Schemes) of the draft DCO.

Appendix G Applicant's Comments on Suffolk County Council submission 'Comments on submissions received at Deadline 5' [REP6-167]

nationalgrid

Appendix G
Applicant's Comments on Suffolk County Council submission 'Comments on submissions received at Deadline 5' [REP6-167]

Table G.1 3.1 (E) Draft DCO [REP5-**061**]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
1.1	Archaeology	Schedule 3 (Requirements) Requirement 5 (Archaeology)	Requirement 5(1) currently refers to "*No archaeological evaluation*…". This is not sufficient, as the requirement needs to control commencement of the authorised development itself. As drafted, there is a potential scenario in which construction or other archaeologically damaging activities could commence before archaeological evaluation and any necessary mitigation have been carried out. Part 1 should therefore be amended so that no stage of the authorised development may commence, including pre-commencement operations involving intrusive groundworks, until an appropriate detailed Written Scheme of Investigation for archaeological evaluation has been submitted to and approved. SCCAS suggested wording: "(1) **No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks, which for the avoidance of doubt includes vegetation removal where that removal involves intrusive groundworks,** *until a* **detailed** *Written Scheme of Investigation for archaeological evaluation works for that stage or relevant part of the authorised development has been submitted to and approved by the relevant planning authority, following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."* Part 2 should also be amended to include pre-commencement operations involving intrusive groundworks. It should secure the subsequent mitigation strategy, whether preservation in situ or preservation by record, and ensure that this is informed by the archaeological evaluation carried out under Part 1 and by the archaeological evaluation that has been completed prior to submission. SCCAS suggested wording: **"(2) *No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive groundworks until for that stage either a preservation in situ Management Plan or a detailed written scheme of investigation, which accords with the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and is informed by the pre-commencement archaeological evaluation under part (1) and the works that have been completed prior to submission, has been submitted to and approved by the relevant planning authority, in consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant Historic***	Please refer to the Applicant's response to this comment at 5.2a in 8.4.18 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
			England." With these amendments, Part 3 could be removed, as SCCAS amended Parts 1 and 2 would clearly set out the process for archaeological evaluation and subsequent mitigation. Parts 4 and 5 are acceptable. Part 6(a) is acceptable. Part 6(b) should be amended to provide a fixed timeframe for submission of the archaeological Updated Project Design. As currently worded, linking the timeframe to approval of the final site-specific post-excavation assessment is problematic. If the final assessment is delayed or not approved, this could prevent submission of the Updated Project Design in a timely manner. The discharging authority also requires a fixed point from which to monitor compliance. SCCAS suggested wording: "*No later than two years following* **completion of construction**, an archaeological updated project design must be submitted to, and approved by, the relevant planning authority following consultation with the county planning authority's archaeological or historic environment service or, if relevant, Historic England. The archaeological updated project design must be in general accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and set out scope for full post-excavation analysis and publication." The sentence "*…and have regard to the site-specific research agendas set out in the detailed written schemes of investigation."* should be removed. The Updated Project Design should be informed by the results of the archaeological fieldwork and define the research agendas appropriate to the archaeology identified during the fieldwork. In effect, the Updated Project Design is an updated detailed Written Scheme of Investigation for post-excavation analysis, publication and archiving. Parts 6(c) and 6(d) are acceptable. Part 7 should be removed, as the matters it seeks to address would be properly controlled through SCCAS amended Parts 1 and 2. As currently drafted, Part 7 is not acceptable because it creates a circular and potentially ineffective control mechanism. The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation are process documents and do not contain the necessary site-specific detail to determine, approve or secure the archaeological works required in advance of intrusive pre-commencement operations. This is particularly problematic because pre-commencement operations may include intrusive groundworks. Such works have the potential to affect archaeological remains before evaluation has been completed and before appropriate mitigation has been agreed. It is therefore necessary to secure archaeological evaluation in advance, in order to inform appropriate mitigation, whether through preservation in situ or preservation by record. Any such mitigation must be implemented in accordance with a detailed Written Scheme of Investigation or preservation in situ management plan that has first been submitted to and approved by the relevant planning authority, following consultation with the relevant archaeological adviser and, where relevant, Historic England.	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
			It is SCCAS's position that Requirement 5 should expressly include pre-commencement operations involving intrusive groundworks within Parts 5(1) and 5(2). This approach is reflected in the Sea Link DCO requirement wording, which provides that no stage of the authorised development may commence, including pre-commencement operations involving intrusive groundworks, until either a preservation in situ Historic Environment Management Plan or a site-specific Written Scheme of Investigation has been submitted to and approved. Sea Link DCO requirement 14 part 2: *"(2) No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive* *groundworks until for that stage either a preservation in situ Historic Environment* *Management Plan or a site-specific written scheme of investigation, which accords with the relevant Overarching Written Scheme of Investigation and is informed by the pre-commencement archaeological surveys, has been submitted to and approved by the relevant planning authority, in consultation with Historic England."* On this basis, archaeological Requirement 5 should be amended to ensure that intrusive pre-commencement operations cannot commence until the archaeological work has been completed under a detailed written scheme of investigation or the parcel of land has been released back to the developer by the relevant archaeological or historic environment service, following completion of the archaeological evaluation.	

Table G.2 3.5 (D) Schedule of Changes to the Draft DCO **[REP5-065]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
2.1	Skills	Item 14 – Schedule 3 requirements (paragraph 15)	SCC welcomes the inclusion of Requirement 15 within Schedule 3 of the draft Development Consent Order ("**DCO**"), providing a mechanism for securing an Employment and Skills Plan ("**ESP**"). SCC agrees that the principle of requiring a Final ESP prior to commencement is appropriate. However, SCC considers that the current drafting does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the socio-economic impacts of the Project and delivering meaningful skills, employment and supply chain outcomes. As currently drafted, Requirement 15 requires submission prior to commencement but does not require the ESP to be approved before works begin. This creates a risk that the document may not be adequately scrutinised or agreed and that deficiencies in its evidence base, scope or delivery mechanisms cannot be resolved prior to implementation. In SCC's view, this significantly weakens the effectiveness of the Requirement as a control. SCC considers that the Requirement must secure formal approval of the ESP by the relevant local authorities. Approval is necessary to ensure that the ESP is consistent with the Outline ESP, incorporates sufficient detail	The Applicant welcomes SCC's support for the principle of Requirement 15 and the preparation of a Final ESP secured through the DCO. The Applicant notes that Requirement 15 of **3.1 Draft Development Consent Order [Revision G]**, has been amended during the Examination 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 does not agree that the Requirement lacks appropriate certainty, control or enforceability, or that the Final ESP will not be subject to adequate scrutiny prior to implementation. The approval process provides a mechanism through which local authorities can review the adequacy of the Final ESP, including its governance arrangements, monitoring and reporting measures, and proposed interventions. The Applicant also does not agree that the use of the terms such as "substantially in accordance with" and "general accordance" creates unacceptable uncertainty. Such wording is commonly used within DCO requirements to provide an appropriate degree of flexibility where further

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comment
			on workforce demand, skills interventions and supply chain measures as well as aligns with local and regional governance arrangements, including the Regional Skills Coordination Function ("**RSCF**"). SCC also has concerns regarding the use of the terms "substantially in accordance with" and "general accordance" within the drafting of the Requirement. These introduce a degree of flexibility which, in the absence of sufficient detail within the Outline ESP, creates uncertainty as to how compliance will be assessed and what level of deviation from the outline document would be acceptable. Given SCC's existing concerns about the limited level of detail in the Outline ESP, reliance on such broadly framed wording risks allowing further dilution or alteration of commitments at the post-consent stage without any clear mechanism for ensuring equivalence or adequacy. This reduces the degree of certainty that the Requirement can provide. These concerns are amplified by the substantive issues identified in SCC's previous submissions, including at Deadline 4, regarding the Outline ESP. In particular, SCC has identified that there is currently no clear linkage between forecast workforce and supply chain demand and the interventions required to address it; that key elements, including interventions and outputs, are deferred to the post-consent stage; and that there are no defined targets, monitoring arrangements or performance measures. In this context, the effectiveness of Requirement 15 is critical. However, as currently drafted, the Requirement does not provide sufficient assurance that these matters will be addressed within the Final ESP, nor that the resulting document will be proportionate, deliverable and evidence-led. This, in turn, raises concerns as to whether the Requirement is sufficiently precise and enforceable, particularly given that the ESP is intended to play a key role in managing socio-economic impacts. SCC therefore considers that Requirement 15 must be strengthened to ensure clarity, certainty and enforceability. In particular, it should require the ESP to be approved in writing by the relevant local authorities prior to commencement, with approval contingent upon the authority being satisfied that the ESP is supported by a robust, phase-specific assessment of workforce and supply chain demand, includes clearly defined interventions aligned to that demand, establishes appropriate governance arrangements including engagement through the RSCF, and contains clear targets, monitoring and reporting mechanisms. Consideration should also be given to strengthening the wording of compliance with the approved ESP, and to providing for ongoing review and updating of the ESP, subject to local authority approval, where necessary to respond to changing labour market conditions or cumulative impacts.	detail is to be developed post-consent. The OESP establishes the scope, objectives, governance arrangements and commitments that will guide preparation of the Final ESP, whilst allowing sufficient flexibility to reflect evolving workforce requirements, procurement arrangements and stakeholder engagement undertaken prior to construction. The Applicant does not consider that this wording would permit the dilution of the commitments established through the OESP. The Applicant further notes that the OESP has been strengthened during the Examination (**8.13 Outline Employment and Skills Plan [Revision B])** to include additional commitments relating to governance, stakeholder engagement, monitoring and review, collaboration with the Regional Skills Coordination Function (RSCF), workforce planning, support for local businesses and SMEs, coordination with other major infrastructure project promoters, and the sharing of workforce and supply chain intelligence. The OESP also establishes the framework through which monitoring, reporting and review arrangements will be developed as part of the Final ESP.

Table G.3 7.2 (B) Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan **[REP5-148]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
3.1	Joint Emergency Planning Unit	Section 5.2 / Table 5.2	Contact details for Emergency Services – Specifically looking at the Suffolk Fire and Rescue Service details listed but the point is likely to be applicable for the other county areas, these are routine contact details. Are they required? In an emergency requiring any of those services it will be a call to 999 (as the line in bold and underlined above states). Does the inclusion of these numbers risk causing confusion for the Site Manager? Is there a reason why the non-emergency numbers are required? As of Deadline 6, the questions above remain. In addition, Suffolk Fire and Rescue Service non-emergency out of hours contact number has changed to 01473 369016 (see https://www.suffolk.gov.uk/suffolk-fire-and-rescue-service/about-suffolk-fire-and-rescue-service/contact-suffolk-fire-and-rescue-service-with-non-emergency-queries)	The report stresses the use of 999 in an emergency that is life or property threatening. Edits have been made to **7.2 Outline Code of Construction Practice Appendix G**, which has been submitted at Deadline 7, to further emphasise this priority, but the other contacts have been retained as these may be more suitable for use in less serious scenarios.
3.2	Joint Emergency Planning Unit	Section 5.2	Ipswich Hospital is not listed here. There may be a reason for this, but this note is made in case it has been missed. As of Deadline 6, Ipswich Hospital is not listed in this version.	Ipswich Hospital has been included in the update to **7.2 Outline Code of Construction Practice Appendix G**, which has been submitted at Deadline 7.
3.3	Joint Emergency Planning Unit		Bold and underlined text - The reference to 'Amber Alert' jumps between warning levels and systems and could cause a bit of confusion. The National Severe Weather Warning Service uses the Red, Amber, Yellow descriptors and the EA Flood Warning Service uses 'Flood Alert, Flood Warning, Severe Flood Warning' (the colours of the triangle symbols being Red - Severe Flood Warning, Red - Flood Warning, Amber – Flood Alert, as seen on the pages 20 and 21). Is the site manager notifying on-site personnel on receipt of a Flood Alert or a Flood Warning? It may be useful to consistently use the same terminology i.e., *'Upon receipt of an EA Flood Warning the site manager(s) shall notify on-site personnel of the Flood Warning and complete a review to ensure that the site is in a state of readiness ahead of a potential flood situation'.* As of Deadline 6, the above point is still valid and could result in confusion on site. While this plan is focussed on flooding, the Met Office Weather Warning System is used for many types of weather/hazard. 6.2.2 currently suggests that weather warnings will follow step by step i.e., suggesting that a yellow warning will be received first, followed by an amber warning, followed by a red warning. This may not always be the case. Consider changing 6.2.2 to be more descriptive to avoid any confusion i.e., 'Upon receipt of a Met Office Weather Warning the site manager(s) shall notify on-site personnel of the Warning ensuring they are aware of the information contained in the 'what to do' section of the table below and complete a review to ensure that the site is in a state of readiness ahead of a potential flood situation'.	Section 6.2.2 of the report has been updated to include the suggested text. However, no change has been made to the tables on pages 20 and 21 as these are direct replicates of the Environment Agency and Met Office warning systems.
3.4	Joint Emergency	Section 7.1.1	The colour of Trigger Level 3 does not align with the EA Flood Warning Service descriptors (see above comment). Recognising that this then directs to the site actions which do use a Yellow, Amber, Red system it is worthwhile	The table presented in section 7 sets out the site specific actions that should be taken in response to the receipt of specific flood warnings and all site personnel will receive regular training in implementation of the FWEPs

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
	Planning Unit		considering how this could be confusing for site personnel, i.e., Severe Weather Warning has a red colour warning triangle and building which then equates to an Amber Alert site action. As of Deadline 6, the above point is still valid and could result in confusion on site.	actions. As noted above, the tables in section 6 are direct replicates and so no changes have been made.
3.5	Joint Emergency Planning Unit	Section 7.2 / Table 7.1	Flood Evacuation Procedures – Level 1 procedures state 'initiate implementation of FWEP Procedures'. What does this include? At the moment this reads that on receipt of a Flood Alert, no further action is taken. The second level then goes into receipt of a Flood Warning. As of Deadline 6, the above point is still valid.	The text in this section, linked to the Level 1 procedures, has been updated to detail what the procedures include.
3.6	Joint Emergency Planning Unit	Section 7.2 / Table 7.1	Level 2 procedures include signage to evacuation points. Is this the same signage as any other evacuation signage used by the site? What does it look like? It may be worthwhile including an image or description of this in the plan or signposting to/referencing any documentation that explains what this looks like, i.e., health and safety briefings for site personnel. As of Deadline 6, the above point is still valid.	The text in this section of the report has been updated to clarify that the signage would be specific flood evacuation signage and that site personnel would be made familiar with signage types and meanings during inductions and via tool box talks.
3.7	Joint Emergency Planning Unit	Section 7.3.1	The sentence is 'If an evacuation point is on private land, it would be the responsibility of the contractor to communicate with the landowner regarding access'. Should this also be added to the pre-occupation actions at section 4? Currently that sections states that the designated point should be located on public land outside the extreme flood extent, with no mention to private land. As of Deadline 6, the above point is still valid. Should the private land aspect be added to section 4 to act as a greater prompt for the Site Manager to explore pre-occupation.	The Applicant clarifies that contractor communication with the landowners of muster sites on private land has been added as a pre-occupation action in section 4.
3.8	Joint Emergency Planning Unit	Annex A – Supporting Figures	The flood risk mapping used to develop the Flood Risk has been updated recently, possibly post the National Grid access to the website. Although this may not affect the assessment it would be worthwhile checking this.	The flood risk mapping has been checked, and one update has been made to Figure A.5 River Blackwater to include the most recent mapping. All other figures are current.

Table G.4 7.3 (D) Outline Construction Traffic Management Plan **[REP5-150]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comment
4.1	Highways	5.2.2	Surveys may also be required on minor roads used as Secondary Access Routes where the width of carriageway, bends or other features may result in damage to the highway. No commitment to undertaking repairs and SCC seeks repairs to all roads that may be affected i.e. PARs, secondary access routes, diversion routes (including informal) during construction activities: 5.2.3 wording not explicit regarding this commitment.	The Applicant has discussed the requirements raised for surveys to be undertaken on secondary access routes in meetings with Suffolk County Council held to discuss the Statement of Common Ground. In accordance with mitigation measure GG06 in **7.2 Code of Construction Practice [Revision F]**, a record of condition will be carried out (photographic and descriptive) of the areas, including highways, that may be affected by construction activities. This matter is agreed between National Grid and Suffolk County Council in the Statement of Common Ground.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comment
4.2	Highways	5.4.2	Where use is made of roads not designated as PARs the routing of HGVs shall be agreed in advance with the LHA. Specific concerns are the number and routing of HGVs associated with construction and removal of site accesses and cross overs (Table 5.2). In the absence of the haul road this may lead to the use of unsuitable local roads which may be avoided or minimised using the LHAs knowledge of the network. SCC is still waiting for a list of Non-primary Access Routes	**7.3 Outline Construction Traffic Management Plan [REP6-082]** includes details on the limited activities which may require the use of non-PARs. The routing from the SRN and MRN of construction vehicles associated with these activities has not been confirmed at this stage of the project development. The Main Works Contractor(s) have committed to a three-month lookahead, and the delivery routes and timings would be communicated by the Main Works Contractor(s) to all companies and/or drivers involved in the transport of materials and plant to and from site by HGV construction vehicles. The three-month lookahead will be shared with Suffolk County Council, as the relevant highway authority. The Applicant and Main Works Contractor(s) will continue to discuss these arrangements with Suffolk County Council during the development of the final CTMP post-DCO.
4.3	Highways	5.4.19	The LHA should be consulted if any exceedances are predicted not just if the National Grids EnvCoW considers that these would have the potential to introduce materially new or materially different residual effects. To do so otherwise allows no independent oversight of the transport movements to demonstrate they will remain within the forecast used to assess impacts.	The Applicant notes the comment from Suffolk County Council on the oversight of any exceedances of forecast vehicle trips against those assessed within the Transport Assessment or Environmental Statement. The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision F]** to note that if there any potential exceedances, the Main Works Contractor will consult National Grid, the Relevant Local Highway Authority and, where appropriate, National Highways.
4.4	Highways	5.8.3	Where access for cyclists and pedestrians cannot be provided a suitable alternative route must be provided.	**Section 5.8.3 of the 7.3 Outline Construction Traffic Management Plan [REP6-082]** has been updated to reflect the commitment "*Alternatives for cyclist and pedestrian access will be considered in circumstances where safe operation of the works or the safe use by active travel users is compromised*."
4.5	Highways	5.8.6, 5.8.10, 5.8.12	Division routes will need to be agreed with LHAs to ensure they are adequate and avoid other planned or emergency works. This will be a requirement of the LHA issuing a NRSWA permit.	The Applicant has discussed the matter of diversion routes with Suffolk County Council in the meetings held to discuss the Statement of Common Ground and has previously confirmed that the local highway authority permit schemes will apply to the Project. The Applicant will continue discussions with Suffolk County Council and the matter is marked as 'under discussion' within the Statement of Common Ground.
4.6	Highways	6.3.1	SCC remain concerned about the lack of visibility of any non-conformance with the CTMP occurring as this remains with the undertaker and LHA's only informed, if needed, corrective action is required other than in the quarterly report (6.3.3). 6.3.2 states that further sanctions (but not reporting) could be included within the final CTMP.	**7.3 Outline Construction Traffic Management Plan [REP6-082]** included additional detail on the non-conformance procedure, and the steps the applicant will follow where any breaches occur. • Stage One: The Transport Co-Ordinator will notify National Grid of any breaches of the CTMP arrangements as and when they occur, or the relevant highway authority confirms a breach and requests the Transport Co-Ordinator to review the data and concerns. The relevant highway authority and the Transport Coordinator would then agree the extent of the breach of controls, and agree action, which is likely to be a contractor warning at this stage. • Stage Two: If a further material breach is identified, National Grid will issue a warning letter to the relevant contractor outlining what action would be taken in the event of any further non-compliance (in general terms). The contractor will then be required to produce an action plan to outline how the issue would be rectified and any additional mitigation measures proposed.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comment
				• Stage Three: Should further breaches continue to occur the contractor would be required to remove the offender from site and the contractor/ supplier would receive a formal warning. Any continued breaches by individuals of the supplier/ contractor may be dealt with by the formal dispute procedures of the contract. Further details on the sanctions which could be applied will be included within the final CTMP.
4.7	Highways	6.4.1 (Enforcement)	Enforcement (6.4.1) does not include actions taken to ensure HGV numbers remain within the assessed values.	Section 6.4.1 of **7.3 Outline Construction Traffic Management Plan [REP6-082]** lists "Construction HGV movements above those included within the Transport Statement (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4) to be reported within the three month look ahead" as a matter of non-compliance. Section 5.4.20 of **7.3 Outline Construction Traffic Management Plan [REP6-082**] provides additional detail on the three-month look ahead. Where the three-month lookahead identifies any predicted exceedances above those documented in the Transport Statement and Environmental Statement, and National Grid's EnvCoW considers that these would have the potential to introduce materially new, or materially different, residual effects, the Main Works Contractor(s) will discuss with National Grid, the relevant Local Highway Authority, and National Highways where appropriate, suitable steps to avoid or mitigate such effects.

Table G.5 7.3 (B) Outline Construction Traffic Management Plan Appendix B - Outline Construction Worker Travel Plan **[REP5-152]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
5.1	Highways	5.2.1	SCC is concerned that the change of minimum car share occupancy target from 1.3 to 2 will be difficult to achieve. Whilst only a target non-compliance would result in additional worker vehicles on the network which may exceed those assumed in the ES and TA. SCC would expect the applicant to evidence such an aspirational target using data from other projects that are being or have been constructed.	The **7.3 Outline Construction Traffic Management Plan Appendix B: Construction Worker Travel Plan [REP5-151]** was updated to reflect the assumptions used within the trip generation for construction worker trips. The target for construction workers (OHL and Cables and Substation) is noted as two per vehicle, as this reflects the trip generation assumption. Admin workers are assumed to arrive in vehicles alone (vehicle occupancy of one) and therefore this has not been added as a target to the CWTP, due to vehicles inherently having a minimum occupancy of 1. These targets have been developed based on the assumptions used within the trip generation, and previous assumptions used in energy projects developed by the technical teams. The Applicant commits to providing monitoring reports on the car occupancy for staff vehicles arriving to site, and this information will be shared with Suffolk as the relevant highway authority on a quarterly basis.

Table G.6 7.4 (E) Outline Landscape and Ecological Management Plan **[REP5-158]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
6.1	Landscape	***Table 1.1 Structure of the Outline LEMP***	This lists under Appendix D:7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Tracked) (Final Issue B) [REP5-160]. However, this only contains the revised proposals for Tilbury North substation and CSE, and not for the other areas, previously included in 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Final Issue A) [APP-325]. SCC considers that this needs to be adressed and a revision C provided at D7 which includes all relevant sites for Appendix D.	Appendix D within the most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes landscape proposals for all Environmental Areas.
6.2	Landscape	***Paragraph 2.2.2***	The added wording is not very clearly worded. SCC would suggest: *Advance works may also take place prior to development consent, where consented under alternative regimes. Any such early works would be controlled under the terms of the relevant planning permission and would not relate to development carried out under the DCO. Any advanced works consented under other regimes, e.g. Town and County Planning Applications, would be agreed and secured through the development control documents as part of the relevant planning applications.* Therefore, such works, measures, and commitments are not included within this Outline LEMP to avoid duplication. However, what remains unresolved is the issue of avoidable vegetation losses during pre-commencement works under the DCO consent, which may occur because relevant plans are not updated or changes in detailed design are not communicated sufficiently early to the contractor. SCC seeks a mechanism/committment that requires a dialogue between the contractor and the design lead of the project to communicate prior to any vegetation clearance on site, so that only vegetation that needs to be removed or managed will be affected. SCC considers this necessary in order to achieve, where possible, a reduction in vegetation loss from the Rochdale Envelope approach of reasonable worst-case presented in the DCO submision documents and to avoid unnecessary losses because of works being carried out to outdated plans.	The Applicant notes the Council's comments in relation to the wording in paragraph 2.2.2 and has updated 7.4 Outline Landscape and Ecological Management Plan [Revision G] at Deadline 7 to include the additional text. In relation to the Council's point regarding vegetation loss and the pre-commencement period. The Applicant does not consider an additional commitment is necessary as the matter is already addressed in **7.2 Code of Construction Practice [Revision G]** by commitment GG14. Commitment GG14 states, '*Following detailed design and prior to pre-commencement activities and construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable*.' The Applicant therefore considers that appropriate controls are already secured to minimise unnecessary vegetation loss and ensure the vegetation removal is based on detailed design information.
6.3	Landscape	***Paragraph 7.5.10***	SCC considers it should be made more explicit that the last sentence only refers to Rainbow Wood and Ashen Shaw. SCC would suggest: *Management of any replacement ancient woodland compensatory replanting for Rainbow Wood and Ashen Shaw will be undertaken pursuant to the management regime contained in LTC's control documents.*	The Applicant confirms that the suggested wording has been included for clarity within the most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** submitted at Deadline 7.
6.4	Landscape	***new paragraph 7.6.4***	SCC welcomes the new paragraph 7.6.4 but would ask that it states explicitly that the records, as well as the pre-condition surveys, will be made available to the relevant local authorities. SCC would suggest: *In accordance with good practice measures, a full record of the condition of hedgerows will be carried out (photographic and descriptive) prior to construction. This record will be available and shared with the relevant local*	The Applicant confirms that the suggested wording has been included within the most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** submitted at Deadline 7. The only amendment was to include some additional text in relation to sharing with other stakeholders, as this was considered too broad a commitment for the Applicant to be certain when compliance had been met. Text revised to '*and*

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
			authorities (and other stakeholders) for comparison following reinstatement after the works have been completed, to demonstrate that the standard of reinstatement meets that recorded in the pre-condition survey or as agreed in the Outline LEMP.	*shared with the relevant local authorities (and if requested, shared with other relevant stakeholders)*'.
6.5	Landscape	New section Woodland Planting Deer and Grey Squirrel Management (**paragraph 9.3.10** onwards)	SCC considers that this is still too non-committal ("potential measures include"). The potential measure of deer fencing also ignores the damage that can be caused by rabbits. Deer and rabbit proof fencing is the only way to protect areas selected for natural regeneration, as no planting/re-planting is envisaged and therefore tree guards etc. do not apply.	The most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** was updated to include for the provision for deer and rabbit proof fencing for areas proposed for natural regeneration, see paragraph 9.3.11.
6.6	Landscape	***Paragraph 9.7.2***	As stated above Appendix D (Final Issue B) **[REP5-160]** does not contain all areas. Further, SCC has proviously asked that the proposals for Wenham Grove CSE compound be revised, which has not been taken on board by the Applicant. SCC is concerned that post-consent there will not be sufficient flexibility to address the comments SCC have raised and that un-satisfactory proposals will have to be carried forward.	Appendix D within the most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes landscape proposals for all Environmental Areas. This includes updated landscape proposals for Wenham Grove CSE compound, which takes on board comments provided by SCC.
6.7	Landscape	***Paragraph 10.1.2***	It should be agreed what would constitute a significant amount. SCC considers that a failure rate of 20% or more would be significant.	As set out in paragraph 10.1.2 of **7.4 Outline Landscape and Ecological Management Plan [Revision G],** a Landscape Clerk of Works will be responsible for determining where 'significant' failures have occurred. The Applicant does not consider it necessary to apply a percentage to the failure rate, so that the Landscape Clerk of Works retains the flexibility to assess the establishment of individual species and substitute these with species demonstrating better establishment based on site conditions. The Applicant considers that a site wide approach to tree establishment and species selection will deliver greater establishment in a timely manner.
6.8	Landscape	***Aftercare for Woodland, Trees and Hedgerows***	SCC mainatins that for trees and woodlands a non-flexible five year aftercare period is wholly insufficient. SCC further considers that annual inspection visits with representatives of the relevant local authorities should be accommdated throughout the aftrecare period. Herbicide use should always be last resort. This is not clear in all bullet points. Watering only trees with a trunk diameter of 6 cm or more will compromise the majority of planting, which will be smaller, and is therefore considered insufficient. Any removed stakes, guards etc need alos be disposed of responsibly. No provisions have been made for aftercare and management for areas of woodland selected for natural regeneration. Further, comments made at D5 in **[REP5-270]** remain valid.	The Applicant notes the Council's comments but maintains the position that a five-year aftercare period for replacement planting (outside Environmental Areas) is considered sufficient to ensure successful planting establishment across the Project. The Applicant provided a comprehensive justification for the aftercare period at Item No. 5.1q in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118**]. In relation to the Council's comment on annual inspections, whilst the Applicant does not agree to the specific request made, it understands the Council seeks further information in relation to the monitoring of the planting in the aftercare period. The Applicant has therefore included wording within the most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which provides a commitment for annual planting monitoring reports to be shared with the relevant Local Planning Authorities. The most recent iteration of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** was updated to provide greater clarity about herbicide use (paragraph 10.2.1), disposal of stakes and tree guards (paragraph 10.2.1) and aftercare within areas proposed for natural regeneration (paragraph 9.3.9). With regard to watering, the Applicant considers the proposals set out in the Outline Landscape and Ecological Management Plan [Revision G] to be sufficient to promote the successful establishment of replacement planting.

Table G.7 7.5 (B) Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation **[REP5-162]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
OAMS				
7.1	Archaeology	1.4.8 The archaeological contractor(s) or Archaeological Clerk of Works (ACoW) will develop a tool box talk on the identification and reporting of unexpected archaeological remains during construction works. The illustrated talk will be given by a suitably qualified member of the archaeological contractor(s) staff or ACoW to the Project construction staff. The talk will include that any findings will be immediately reported to the Archaeological Clerk of Works on site who, following initial investigations to establish the validity of any remains, report the findings on the relevant stakeholders as appropriate.	This needs to be amended to state that it is the ACoWs responsibility to develop the toolbox talks, to ensure consistency across the scheme. The ACoW can instruct the archaeological contractor to deliver the toolbox talks. *The Archaeological Clerk of Works (ACoW) will develop a tool box talk on the identification and reporting of unexpected archaeological remains during construction works. The illustrated talk will be given by a suitably qualified member of the archaeological contractor(s) staff or ACoW to the Project construction staff. The talk will include that any findings will be immediately reported to the Archaeological Clerk of Works on site who, following initial investigations to establish the validity of any remains, report the findings on the relevant stakeholders as appropriate.*	This update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.2	Archaeology	1.9 Table 1.2	This should include the priority areas where design change to the Order Limits means that the revised route has not been evaluated.	This update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.3	Archaeology	1.7.4 National Grid will appoint an Archaeological Clerk of Works (ACoW) for the Project. The ACoW, working on behalf of National Grid, will be responsible for liaising with the Local Planning Authority Archaeological Advisors to ensure that evaluation and mitigation measures are correctly implemented, monitored, and maintained during the	This requires amendments to clarify that the appointed ACoW is for client site archaeological assurance, liaison and compliance monitoring, which is distinct from the archaeological contractor who undertakes the fieldwork. This sentence need to be removed *"This will include monitoring the Archaeological Contractor's work to ensure compliance with the DWSIs and this Outline AMS-OWSI"*, as this is the role of the LPAAA on behalf of the discharging authority. This corresponds to 5.2.11 in the OWSI. SCCAS would therefore advise the following amendments to add clarity to the role: *National Grid will appoint an Archaeological Clerk of Works (ACoW) for the Project. The ACoW* **will be a suitably qualified and experienced archaeologist***,* **appointed to act on** *behalf of National Grid~~,~~.* **The ACoW** *will be responsible for liaising with the Local Planning Authority Archaeological Advisors* **and the project team** *to ensure that evaluation and mitigation*	The Applicant considers that the ACoW should monitor works on behalf of National Grid for compliance with DWSIs and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**. As SCC have not requested deletion of the rest of this sentence referring to archaeological mitigation requirements there seems no reason to delete the first part. The inclusion of this within the ACoWs role does not prevent the LPA discharging the requirements. The number of ACoW is a decision for the delivery team to respond to on-site requirements and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** does not intend to define the precise number. All other requested updates are included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		construction phase of the works. This will include monitoring the Archaeological Contractor's work to ensure compliance with the DWSIs and this Outline AMS-OWSI and monitoring the specific construction activities to ensure compliance with all archaeological mitigation requirements, including protection measures, set out in the Outline CoCP (document reference 7.2).	*measures are correctly implemented, monitored, and maintained during the construction phase of the works.* **The ACoW shall be responsible for** *monitoring the specific construction activities to ensure compliance with all archaeological mitigation requirements, including protection measures, set out in the Outline CoCP (document reference 7.2).* **The ACoW will also advise the project team on archaeological constraints, including ensuring that constraints identified through the DWSIs are communicated appropriately and incorporated into project-wide constraints information, and will provide toolbox talks or other site briefings where required to inform site personnel of archaeological and historic environment constraints.** **Question:** will the Archaeological Clerk of Works comprise a team of people as it is stated in the Deadline 5 submissions? If this is the case that should be made apparent in the OAMS-OWSI.	
7.4	Archaeology	1.7.5 National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor(s) **or National Grid's Archaeological Advisor** [emphasis added] will be responsible for the production of DWSIs for each stage of archaeological investigation. National Grid's Archaeological Advisor will submit the DWSIs to the appropriate LPAAA for review and approval.	This text has changed since SCCAS last reviewed the pre-submission document. The text reviewed by SCCAS in the pre-submission document stated: *"*National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor will be responsible for the production of DWSIs for each stage of archaeological investigation. National Grid's Archaeological Advisor will submit the DWSIs to the appropriate LPAAA for review and approval*."* Although the addition of "*or National Grid's Archaeological Advisor"* may appear to be a minor adjustment to the text, it represents a significant change to the OAMS and has implications for the remainder of the OAMS-OWSI. Where the Applicant is appointing the Archaeological Contractor to carry out the fieldwork, it would normally be expected that the contractor prepares the detailed methodology for that work, as they are the party responsible for delivering it. If National Grid's Archaeological Advisor is to prepare the DWSIs, this raises a number of questions, including whether the Archaeological Contractor has agreed the methodology set out in the DWSIs, whether the contractor can practically deliver the archaeological works, who owns the risk if the fieldwork methodology proves inadequate and whether the DWSIs will reflect the contractor's staffing, specialist provision, plant and site recording procedures. This also raises concerns where National Grid's Archaeological Advisor prepares DWSIs prior to the appointment of an Archaeological Contractor. In such circumstances, the DWSIs would not be able to provide any details on staffing, specialist provision, programme, site procedures or practical approach to delivery. This creates a risk that the DWSIs may not fully reflect how the archaeological works will be implemented on site and during post-excavation assessment. Therefore, where National Grid's Archaeological Advisor prepares the DWSIs, the Archaeological Contractor should be required to produce a Contractor's Method Statement (CMS) to confirm compliance with the relevant DWSI. The CMS should set out the contractor's procedures for	This update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7. Regarding the question of construction contractor responsibility for appointing archaeological contractor(s) – National Grid have ultimate responsibility for delivery of the archaeological evaluation and mitigation.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
			undertaking the works defined in the DWSI and provide details of the staffing, specialist provision, plant, programme, site procedures and contractor-specific methodologies proposed to deliver the archaeological works. Provision for this must therefore be made in the relevant DWSIs. In such instances, the DWSI should not be considered complete for the purposes of commencing archaeological fieldwork until the CMS has been reviewed and approved by the relevant LPAAA and appended to the DWSI. In effect, where a DWSI prepared by the Applicants Archaeological Advisor cannot provide full contractor details, those details will be provided through the appointed Archaeological Contractor's CMS, which, once approved by the relevant LPAAA, will be appended to the relevant DWSI. It is also not uncommon for more than one Archaeological Contractor to be appointed to deliver archaeological fieldwork and post-excavation work, particularly on large infrastructure schemes. This is acknowledged in the OWSI (para 5.1.6 – 5.1.7). The OAMS should therefore make provision for one or more contractors and clarify how contractor method statements will be secured. SCCAS would therefore recommend the following amendment to provide clarity: *National Grid will appoint* **one or more** *Archaeological Contractor***s** *to carry out the archaeological evaluation and mitigation fieldwork. The appointed Archaeological Contractor(s), or National Grid's Archaeological Advisor* **where appropriate,** *will be responsible for the production of DWSIs for each stage of archaeological investigation***. Where a DWSI is prepared by National Grid's Archaeological Advisor, including where this occurs prior to the appointment of an Archaeological Contractor, the relevant DWSI shall contain provision for the appointed Archaeological Contractor to prepare a Contractor's Method Statement (CMS). The CMS shall confirm compliance with the DWSI and set out how the works defined in the DWSI will be delivered. The CMS shall include, as appropriate, details of staffing, specialist provision, plant, programme, site procedures and any contractor-specific methodologies and insurance details.** *National Grid's Archaeological Advisor will submit the DWSIs to* **the LPA for approval subject to review by** *the appropriate LPAAA* **and where required Historic England. Where a CMS is required under the DWSI, the CMS shall be submitted to the LPAAA for review and approval. Archaeological fieldwork shall not commence until an approved DWSI, and where appropriate CMS, is in place.** This should also be reflected in paragraphs 5.1.1–5.1.10 of the OWSI. As currently drafted, these paragraphs identify the Archaeological Contractor(s) as responsible for preparing the DWSIs and do not clearly provide for DWSIs to be prepared by the Applicant's Archaeological Advisor. If the OAMS-OWSI is to allow DWSIs to be prepared by either the appointed Archaeological Contractor(s) or the Applicant's Archaeological Advisor, the OWSI should be amended consistently to explain how this will operate in practice. SCCAS notes that the Deadline 5 submitted DWSIs for archaeological mitigation of the priority areas refer to the need for a commissioned Archaeological Contractor to provide a Contractor's Method Statement in relation to the DWSI, as the submitted DWSIs do not contain contractor details, specialist provision, insurance details etc. The OAMS-OWSI should	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
			therefore include provision for the production of Contractor Method Statements. In particular, where a DWSI is prepared prior to the appointment of an Archaeological Contractor, or where contractor-specific delivery details are not included in the DWSI, the appointed Archaeological Contractor should be required to prepare a Contractor's Method Statement confirming compliance with the DWSI and setting out how the approved archaeological works will be delivered. **Question:** Paragraph 1.7.5 states that is National Grid who will be responsible for appointing the archaeological contractor(s). Will the main construction contractor have any responsibility for appointing archaeological contractor(s) for the delivery of post-consent archaeological works?	
7.5	Archaeology	2.1.7 Areas of archaeological mitigation will be informed by the significance of archaeological remains indicated by the results of trial trench evaluation. Classes of archaeological features such as post medieval field boundaries which are recorded on 1st ed OS mapping and sterile pits (where they appear in isolation) are unlikely to require further mitigation. In agreement with the LPAAA, any such areas of the Project will be returned to National Grid.	*SCCAS would recommend the following amendment for clarity:* *"Areas of archaeological mitigation will be informed by the significance of archaeological remains indicated by the results of trial trench evaluation. Classes of archaeological features such as post medieval field boundaries which are recorded on 1st ed OS mapping and sterile pits (where they appear in isolation) are unlikely to require further mitigation. In agreement with the LPAAA, any* **areas not defined for archaeological mitigation** *will be returned to National Grid."* This clarifies that any areas not requiring mitigation can be released to the developer which will facilitate progress of the development.	This update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.6	Archaeology	3.1.7 The strategy for each mitigation area, as set out in the DWSIs, will be designed to answer specific research questions to advance knowledge gain, or to ensure the protection of archaeological features where they do not need to be excavated. Not all sites will be fully excavated, as the primary aim of the strategy is to maximise knowledge gain. **The mitigation of the Project is not designed to allow recording for recording's**	SCCAS have concerns with this addition to the OAMS *"The mitigation of the Project is not designed to allow recording for recording's sake, but rather to excavate those sites with intrinsic or group value, which will add to the corpus of knowledge for the region. This approach is not new, and has been used on other major linear projects, such as the A428, the A303 and High Speed 2 (HS2)."* A statement of this nature should not be in a control document and should be removed, as it does not provide a mechanism for the delivery of archaeological mitigation. The OAMS-OWSI should set out how archaeological mitigation will be secured and delivered in response to the development impact. This is not a research project, mitigation for development impact recognises that archaeological remains affected by the development will be damaged or destroyed and will not be available for future investigation. Decisions on levels of sampling for individual features would be made in the relevant DWSIs and reflect the significance of individual features. Evaluation can only identify part of the archaeological resource, therefore the project	Paragraph 3.1.7 has been deleted and paragraph 3.1.5 has been updated, to avoid repetition. The updates in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7, take account of these comments. However, the Applicant notes that this section of the document is focused on the research agenda and how that will inform mitigation and some of the requested updates are not relevant to this section of the document.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		sake, but rather to excavate those sites with intrinsic or group value, which will add to the corpus of knowledge for the region. This approach is not new, and has been used on other major linear projects, such as the A428, the A303 and High Speed 2 (HS2). [emphasis added]	should anticipate that further archaeological features not indicated by the evaluation and not covered by the initial research questions will be exposed within archaeological mitigation areas, and the research questions set out within the DWSIs will need to be revised in the Updated Project Design. Our understanding of major linear projects such as HS2, A428 and A303 is that areas of archaeological mitigation would be targeted to examine areas of archaeological potential indicated by evaluation which advance knowledge gain. This relates to the selection of areas within the development for mitigation, not how the mitigation will be carried out within those areas. Therefore, SCCAS would recommend the following amendment: The strategy for each mitigation area, as set out in the DWSIs, will be designed **in accordance with the regional research framework and agenda and national and local guidance, and based on the results of archaeological trial trenching, geophysical survey and other information resources.** **Where archaeological remains will be impacted by the development, the mitigation strategy and will aim to provide a full record of any archaeological features, structures and deposits impacted by the development appropriate to the agreed mitigation methodology.** **Where preservation in situ can be achieved through modification of design or other protective measures, the extent of archaeological investigation should be sufficient to characterise and establish suitability for preservation in situ. Such investigation would not normally comprise a full and detailed record of the heritage asset to be preserved.**	
7.7	Archaeology	4.2.9 Temporary crossings would be required over watercourses, streams, and field ditches to maintain the haul roads along the alignment; these would likely consist of temporary bridges or culverts. Where Project related access routes cross smaller watercourses and streams a concrete culvert will be placed into the feature with some potential digging out in the base. This, however, will be minimal and it is concluded that archaeologically significant waterlogged and/or organic-rich sediments would not be impacted by	This needs to be amended for clarity to say that: *"Temporary crossings would be required over watercourses, streams, and field ditches to maintain the haul roads along the alignment; these would likely consist of temporary bridges or culverts. Where Project related access routes cross smaller watercourses and streams a concrete culvert will be placed into the feature with some potential digging out in the base. This, however, will be minimal and* **it is considered unlikely that archaeologically significant waterlogged and/or organic rich deposits would be affected** *by the works.* **However, where significant near surface archaeological remains are identified in adjacent trial trenching, mitigation may be required to manage impacts on near surface archaeology.** *The culvert would be overlaid by crushed stone and the haul road surfaces. All these elements would be removed once no longer required. Further detail is included in ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2)."*	This update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		the works. The culvert would be overlaid by crushed stone and the haul road surfaces. All these elements would be removed once no longer required. Further detail is included in ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2).		
7.8	Archaeology	4.6.5 *As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology and, in some cases, palaeoenvironmental deposits located within these areas. The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.*	Our previous comment has not been satisfactorily addressed. Previous comment: SCCAS do not believe this statement is accurate particularly for the river valleys, facilitating measures such as de-watering will have widespread impact on palaeoenvironmental deposits to significant depth. Please speak to Historic England regional Science advisor - Zoe Outram. SCCAS would advise the following amendment: *As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology and, in some cases, palaeoenvironmental deposits located within these areas. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.* **However, where dewatering is required to facilitate construction, these impacts on deeply buried archaeological and palaeoenvironmental/geoarchaeologically significant deposits must be addressed and appropriately mitigated.**	Paragraphs 4.6.1-6 are concerned with open cut underground cable installation; while the Applicant cannot provide a lower LoD for open cut cable installation, excavation to depths at which dewatering would be needed are not expected. **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]** concludes that dewatering is not anticipated. The exception to this is at trenchless crossing locations where dewatering of construction excavations may be required. Therefore, it is not necessary to make this update for the opencut sections of the underground cable.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
7.9	Archaeology	4.6.11 *Temporary discharges may be required relating to dewatering and over-pumping in the cable sections, particularly where deeper working is required such as at the trenchless crossing. It is anticipated these would be made to ground, rather than to watercourses. Where this is not practicable in localised areas, any discharge to surface water would be made in compliance with relevant consents.*	Is this meant to be in the open cut section? The creation of silt capture pits would have archaeological impact and depending on the scale of the dewatering this may also impact archaeological and palaeoenvironmental sediments by changing the preservation environment and accelerating decomposition of organic and metal artefacts and palaeoenvironmental remains. Therefore, SCCAS recommends the addition of the following statement: **Following finalisation of designs and construction methodologies a programme of appropriate archaeological and palaeoenvironmental mitigation for these impacts will be designed and included in DWSIs.**	This description of works is in the correct section (trenchless installation) and accords with the information in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.10	Archaeology	4.6.12 *Some trenchless methods require use of a drilling slurry such as bentonite to support the surrounding ground while the drilling/boring commences. The use of pressurised liquids presents a risk of environmental contamination, either through loss of fluids into permeable strata or breakout of fluids at the surface. Adequate mitigation of these risks requires detailed ground investigation and further design of the trenchless crossings – further assessment of this is presented in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). Space for access arrangements from the public highway to the proposed trenchless crossing locations is included within the Order Limits in the event of a*	Reference to "*ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9)"* does not assess impacts to archaeology or geoarchaeologically/palaeoenvironmental significant deposits and therefore should be removed from this paragraph.	This refers to assessment of the trenchless crossing method rather than archaeological assessment of potential impacts resulting from trenchless crossing, which would be informed in part by ES Chapter 9.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		pollution incident during construction.		
7.11	Archaeology	4.6.13 The construction methods for trenchless installation of underground cable are not expected to affect near surface archaeology in normal working, with the exception of the drive and reception locations. In these locations impacts to both near surface and deeply buried archaeological deposits could occur, due to construction passing through the full stratigraphy to reach the required depth. Within the trenchless crossing there is the possibility of a drilling slurry breakout. However, this is considered to be unlikely with the proposed mitigation of these risks as specified by GH11 and GH12 of 7.2 Code of Construction Practice, and consequently archaeological mitigation in advance is not proposed. The trenchless crossing locations are subject to geophysical survey and archaeological trial trench evaluation to ensure the character and extent of any archaeology in these locations is understood. This would inform any potential mitigation requirements in the event of a drilling slurry breakout, which would be undertaken in accordance with the terms set out in a DWSI. Where it is determined that preservation in situ is	This paragraph is incorrect and doesn't fit with 4.6.15. Sufficient information needs to be obtained to establish whether drilling clay break out will be a significant risk of the drilling activity and therefore whether preservation in situ of near surface archaeology can or cannot be achieved. Archaeological mitigation would be included for areas outside of the drilling pits where the drill depth has not reached sufficient depth to allow for preservation in situ. The areas above the trenchless crossings should not be treated as exclusion zones to prohibit the future investigation of archaeological remains that may be preserved in situ. As currently written the paragraph states that trenchless installation is not expected to affect near-surface archaeology in normal working, except at drive and reception locations, and that archaeological mitigation in advance is therefore not proposed. However, since the final design and trenchless crossing method has not been finalised, this claim is unsupported. This paragraph should be amended to highlight that further archaeological and geological assessment would be required to determine the exact trenchless crossing method and what archaeological mitigation required. GH11 and GH12 provide relevant controls in relation to hydrogeological risk and drilling-fluid breakout, but they do not in themselves secure an adequate archaeological or palaeoenvironmental mitigation strategy. The reference in GH11 to assessing the consequences for sensitive archaeological deposits is welcomed, but further detail is required regarding how such deposits will be identified, assessed and mitigated. GH12 addresses engineering measures such as monitoring, containment, removal, sealing and remediation, but these measures may themselves involve ground disturbance with the potential to affect archaeological deposits. Therefore, GH12 is unsuitable to be applied to an area of archaeological sensitivity and a specific methodology for managing bentonite/drilling clay break out and clean up **must** be developed and included in the DWSI and reference to GH12 should be removed from OAMS-OWSI. Therefore, paragraph 4.6.13 should be amended to state it is currently unknown what level of archaeological mitigation would be required for the trenchless crossing area as final designs have not been formalised. A detailed strategy for further archaeological and geoarchaeological assessment will be developed post-consent.	Paragraph 4.6.13 already sets out that evaluation is needed to inform the approach to archaeological mitigation in areas of trenchless crossing. An update has been made to clarify that mitigation is not 'currently' proposed. There is no contradiction with paragraph 4.6.15, which reiterates that archaeological evaluation is required to determine mitigation. Commitment GH12 in **7.2 Outline Code of Construction Practice [Revision G]** has been updated at the request of SCC to include a bullet point signposting to this document so the reference is appropriate.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting, emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance.		
7.12	Archaeology	4.6.14 *The trenchless construction techniques have potential to affect deeply buried deposits depending on the potential where identified by geoarchaeological monitoring of the ground investigation works in these locations. In most cases it is assessed that the depth is great enough to avoid impacts to even deeply buried deposits, however, where the available data suggests the potential for impacts on deeply buried deposits, a programme of geoarchaeological and palaeoenvironmental investigation will be required to establish any mitigation measures that may be required.*	This statement is incorrect and doesn't fit with paragraph 4.6.15. Drilling through unstable, waterlogged deposits containing archaeological and palaeoenvironmental remains, including peat, is likely to result in significant impact. This may occur through the introduction of drilling clay or drilling fluids into the deposits, particularly where sub-surface breakout occurs. Such impacts have the potential to affect local hydrology, compromise deposit integrity, and limit the scope for future scientific archaeological and palaeoenvironmental analysis. Consequently, preservation in situ would not be achieved. In light of the likely effects paragraph 4.6.14 should be amended to state that for these locations, an appropriate programme of palaeoenvironmental and geoarchaeological investigation will be required to provide a robust record of the affected deposits, as mitigation for the anticipated impacts. The precise methodology should be informed by the final crossing design, but should include, as a minimum, transects of sleeved cores across the area of impact to recover full deposit profiles. Additional techniques, including trenching and column sampling, should also be retained as potential methods, to be applied where appropriate based on the final design, ground conditions, and archaeological potential. SCCAS will provide the applicant examples of methodologies for managing break-outs in archaeologically sensitive areas. SCCAS would recommend the following amendment to add clarity: *The trenchless construction techniques have potential to affect deeply buried deposits depending on the potential, where identified by geoarchaeological monitoring of the ground investigation works in these locations. Where the available data* **from geoarchaeological monitoring of the ground investigation works** *suggests the potential for impacts on deeply buried deposits, a programme of geoarchaeological and palaeoenvironmental investigation will be required to establish any mitigation measures that may be required.*	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7. The geoarchaeological investigation methods mentioned are included in section 'Geoarchaeological and Palaeoenvironmental Investigation' of the OWSI in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C].**
7.13	Archaeology	4.6.15 *Currently, the technique(s) to be employed are unknown but will be confirmed at the detailed design stage. When*	There appears to be a continuity issue between paragraph 4.6.15 and paragraphs 4.6.13 and 4.6.14. Paragraph 4.6.15 indicates that the trenchless techniques are not yet confirmed and that potential impacts will be reviewed at detailed design stage. Paragraphs 4.6.13 and 4.6.14 should therefore be amended, as detailed above, to ensure they reflect this staged approach and do not pre-empt the outcome of archaeological and geological assessment.	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		confirmed, the areas of trenchless crossing within the Order Limits resulting in below ground impacts will be reviewed for potential impacts on near-surface archaeological remains and, where deemed appropriate based on borehole data and information on superficial geology held by the British Geological Survey, for potential impacts on deeper deposits of geoarchaeological and palaeoenvironmental significance. The scope of the archaeological evaluation work in these areas will be set out in the relevant DWSIs. The scope of the evaluation set out in the DWSIs will be formulated in discussion with the relevant LPAAA and, in the cases where geoarchaeological and palaeoenvironmental potential is identified, the Historic England regional science advisor.	The precise archaeological, palaeoenvironmental and geoarchaeological methodology for the river crossing should be informed by the final crossing design, but should include, as a minimum, transects of sleeved cores across the area of impact to recover full deposit profiles. Additional techniques, including trenching and column sampling, should also be retained as potential methods, to be applied where appropriate based on the final design, ground conditions, and archaeological potential. *This requires amendments for clarity:* *Currently, the technique(s) to be employed are unknown but will be confirmed at the detailed design stage. When confirmed, the areas of trenchless crossing within the Order Limits resulting in below ground impacts* **will be reviewed with the relevant LPAAA** *for potential impacts on near-surface archaeological remains and, where deemed appropriate based on borehole data and information on superficial geology held by the British Geological Survey, for potential impacts on deeper deposits of geoarchaeological and palaeoenvironmental significance. The scope of the evaluation* **and mitigation will be** *set out in the DWSIs* **and will be agreed** *and* **where appropriate**, *the Historic England regional science advisor.*	
7.14	Archaeology	4.7.2 *Where pylons are proposed to be removed, it may be necessary to establish a 60 m x 60 m working area. Typically, this area would not be stoned; instead, if ground conditions are poor, trackway may be used. Removal of pylons would involve removing the conductors by lowering cut sections to the ground, then lowering the insulators and fittings to the ground. Where a pylon is in a clear area and it is safe to do so,*	Where pylon felling is involved, this is likely to have significant impact to archaeological remains. Therefore, the final designed felling zone should be archaeologically investigated through trial trenching to assess the impact and whether archaeological mitigation is required. Where temporary trackway is proposed, it may reduce direct rutting but may still result in soil compaction, particularly in wet ground conditions or where heavy plant is used. Any subsequent soil decompaction, ripping, subsoiling or remediation works may themselves be intrusive and damaging to archaeological heritage assets. Accordingly, areas requiring decompaction should be assessed archaeologically in advance of any soil decompaction/remediation works taking place.	Regarding pylon felling the weight of a steel lattice pylon is proportionally in the lower section of the pylon and the ground surface is only slightly impacted by felling. Standard practice is to fell a pylon so it falls on its 'flat' side and not the cross arms as these could penetrate the ground surface. Felling so the pylon lands on the 'flat' side is also preferred for engineering reasons as it is easier to dismantle the felled pylon. The depression caused by felling is slight with only 50 -75mm expected even in wet conditions. The Applicant does not, therefore, propose to archaeologically evaluate pylon felling locations. Regarding the concerns about soil remediation following the use of trackway, paragraph 4.9.3 already addresses this as follows: "…*in areas where there has been no previous archaeological impact the Outline Soil Resource Plan includes provision to ensure potential archaeological impacts would be managed and considered in determining appropriate reinstatement measures and would be detailed in the final Soil Resource Plan*"

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		the pylon would be removed by 'felling' the whole structure. *Alternatively, a mobile crane would be used to remove the structure in sections which would then be lowered to the ground. Once dismantled, the pylon steelwork would typically be broken up on site then removed. The reinforced concrete foundation would then be backfilled and the ground reinstated and any waste removed from site to a suitable licensed waste management facility.*		
OWSI				
7.15	Archaeology	5.1.1 *Should there be any outstanding areas requiring evaluation due to previous issues, such as with land access, the work would be carried out post-consent under the terms of any existing SSWSI that was agreed with the LPAAAs prior to the grant of the DCO. If a SSWSI does not exist for the relevant area a separate DWSIs would be prepared setting out suitable evaluation measures. DWSIs would be prepared setting out in detail specific mitigation measures for the detailed design of the Project, informed by the strategy described in this Outline AMS-OWSI. Existing models and new datasets*	This paragraph 5.1.1 has substantially changed since the last time SCCAS reviewed this document, therefore SCCAS have the following comments and there needs to be the addition of The Applicants Archaeological Advisor to produce DWSIs. As it proposed in the OAMS paragraph 1.7.5. As set out in our comments on paragraph 1.7.5 in the OAMS, there is a need for the addition of a paragraph into section 5.1 of the OWSI which states: **Where a DWSI is produced by the Applicants Archaeological Advisor the requirement for a Archaeological Contractors Method Statement will be included in the DWSI, along with a mechanism for the relevant LPAAA to review and approve the Archaeological Contractors Method Statement.** SCCAS would also advise the following amendment for 5.1.1: *DWSIs* **will** *be prepared setting out in detail* **evaluation and** *mitigation* **targeting impacts defined in the final** *design of the Project.* **This will be** *informed by the strategy described in this Outline AMS-OWSI.* **DWSIs for trial trenching will target areas of project impact, including haul roads, SuDs ponds, pylon bases, compounds, working areas, laydown areas and any area which will be subject to significant ground disturbance.** **The results of evaluation (geophysics and trial trenching) will** *inform* **the** *design of mitigation works in the* **subsequent mitigation** *DWSIs.* ***National Grid will appoint* one or more *Archaeological Contractors to carry out the archaeological evaluation and mitigation fieldwork. The appointed Archaeological Contractor(s), or National Grid's***	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7, with minor amendments to align with standard Project terminology and for clarity.

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		collected during fieldwork would inform design of mitigation works in the DWSIs during the investigations. These DWSIs would be prepared by the relevant Archaeological Contractor(s) in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic England. The DWSIs would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and shared with, if relevant, Historic England, prior to works commencing in the area to which each DWSI applies. A period of 28 days for review and agreement of DWSIs will be included in the programme.	***Archaeological Advisor*** **where appropriate,** ***will be responsible for the production of DWSIs for each stage of archaeological investigation*****. Where a DWSI is prepared by National Grid's Archaeological Advisor, including where this occurs prior to the appointment of an Archaeological Contractor, the relevant DWSI shall contain provision for the appointed Archaeological Contractor to prepare a Contractor's Method Statement (CMS). The CMS shall confirm compliance with the DWSI and set out how the works defined in the DWSI will be delivered. The CMS shall include, as appropriate, details of staffing, specialist provision, plant, programme, site procedures and any contractor-specific methodologies and insurance details.** ***National Grid's Archaeological Advisor will submit the DWSIs to*** **the LPA for approval subject to review by** ***the appropriate LPAAA*** **and where required Historic England. Where a CMS is required under the DWSI, the CMS shall be submitted to the LPAAA for review and approval.** **Archaeological fieldwork shall not commence until an approved DWSI, and where appropriate CMS, is in place.** **Any areas of evaluation within the priority areas that have not been completed,** *such as with land access, the work would be carried out post-consent under the terms of any existing SSWSI that was agreed with the LPAAAs prior to the grant of the DCO. If a SSWSI does not exist for the relevant area a separate DWSIs would be prepared setting out suitable evaluation measures as per the above.* This provides clarity for the existing outstanding areas of archaeological evaluation within the priority sections and for the remaining evaluation required on the overall project, and brings DWSI production in line with 1.7.5 of the OAMS.	
7.16	Archaeology	5.1.3 *DWSIs would be prepared for specific geographic areas of works, such as a section of overhead line construction, or for types of construction works, such as temporary construction compounds. Separate DWSIs will, however, be prepared for each archaeological phase, e.g. evaluation and mitigation. The approach would depend on the requirements of the construction programme and the nature of archaeology to be mitigated.*	SCCAS would recommend the following amendment to add clarity and consistency: **Separate** *DWSIs would be prepared for specific geographic areas of works, such as a section of overhead line construction, or for types of construction works, such as temporary construction compounds*~~.~~**, and for each archaeological phase e.g. evaluation and mitigation.** *The approach* **will be informed by the potential impacts** *of the construction programme and the nature of archaeology to be mitigated.*	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7, although the reference to the construction programme has been retained as this will inform the order in which DWSIs are produced.

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7.17	Archaeology	5.1.5 *The Archaeological Clerk of Works (ACoW) and/or the Archaeological Contractor(s) would produce archaeological constraints maps and give Tool Box Talks to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under the Outline AMS-OWSI, DWSI and generally, to ensure that these are put in place and complied with.*	This amendment is required due to changes in the OAMS. To clearly define the role and responsibilities of the Archaeological Clerk of Works (ACoW) for the project. This is to ensure consistency with the role within the OAMS-OWSI (see requested amendment to para 1.7.4 of the OAMS) and the Outline Code of Construction Practice (OCoCP) and avoid ambiguity over the ACoW's remit during construction. *The Archaeological Clerk of Works (ACoW)* **will advise the project team to ensure that the constraints identified in the approved DWSIs are incorporated into the project-wide constraints mapping. The ACoW shall prepare toolbox talks or other briefings to site personnel so that archaeological and historic environment constraints are understood before and during construction works.**	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.18	Archaeology	5.2.19 *Sites that have been completed would be subject to a formal signing off procedure, in order to allow the mitigation areas to be released to the construction team. The Archaeological Contractor(s) would submit a completion statement to the ACoW. This statement will include a final site plan, showing locations of archaeological features and interventions (in both PDF and Shapefile format). The ACoW would submit the accepted completion statement to National Grid and the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs.*	This introduces the concept of an "accepted completion statement" by the ACoW before LPAAA confirmation that the completion statement is appropriate for sign off. The LPAAA is the monitoring authority on behalf of the discharging authorities with regards to compliance to the DCO requirement. While SCCAS support the idea that the ACoW will endeavour to ensure works are completed to an appropriate standard, the final decision on fieldwork completion remains with the LPAAA. This paragraph should be amended to the following, as it can only be considered accepted following LPAAA approval: *Sites that have been completed would be subject to a formal signing off procedure, in order to allow the mitigation areas to be released to the construction team. The Archaeological Contractor(s) would submit a completion statement to the ACoW. This statement will include a final site plan, showing locations of archaeological features and interventions (in both PDF and Shapefile format). The ACoW would submit the completion statement to the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with* **National Grid** *and Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs.*	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
7.19	Archaeology	5.2.21 *Dispute Resolution In the event of disagreement between the Archaeological Contractor(s), the ACoW, the relevant Local Planning Authority Archaeological Advisor and/or National Grid on the progress, strategy or completion of work the parties must use their reasonable endeavours to secure the amicable resolution of any dispute or difference arising between them in accordance with the following provisions:* *A senior representative(s) of each party shall meet as soon as reasonably practicable in order to identify a means through which matters in dispute may be resolved.* *If the matter is not resolved at that level within 20 business days of either party requesting such a meeting (or such longer period as may be agreed between the parties) then the provisions of article 62 (arbitration) of the Development Consent Order (document reference 3.1) will apply.*	SCCAS have never encountered this on previous NSIPs and are unsure about this matter. This should be discussed by the legal teams to determine appropriateness of the use of Article 62 with regards to works secured by requirements.	This paragraph in the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]**, submitted at Deadline 5, was added to respond to ExQ2 HE 2.14. The Applicant has since considered comments raised by SCCAS and removed the paragraph in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**. Disagreement (if any) 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]**.
7.20	Archaeology	5.3.2 *Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in place at the start of the construction programme to ensure their long-term survival will be identified in the DWSIs.*	Our previous comment still stands requiring provision for a Historic Environment Management Plan (HEMP). "*Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in place at the start of the construction programme to ensure their long-term survival will be identified in the DWSIs* **and Historic Environment Management Plans (HEMPs)."** A primary reason why the DWSI is not an appropriate mechanism for securing preservation in situ is that archaeological heritage assets may be identified during the mitigation phase which were not anticipated on the basis of the evaluation results, but which nevertheless require, or are considered economically desirable for, preservation in situ. A HEMP is therefore the	In order to align with the wording of Requirement 5 of **3.1 Draft DCO** reference has been included to a preservation in situ plan rather than HEMP.

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			more appropriate mechanism for securing and managing such preservation measures. A single HEMP could be prepared for the whole scheme, setting out the mechanisms and procedures for preservation in situ. Any sites, deposits or features subsequently identified as requiring preservation in situ could then be added to, and managed through, that document.	
7.21	Archaeology	5.3.4 *For each site or heritage asset, protection measures will be described in a DWSI prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and 'Tool-Box Talks' to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with. New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted.*	Please see comment 5.3.2 above. Our previous comment still stands: "*For each site or heritage asset, protection measures will be described in a DWSI* **and Historic Environment Management Plan (HEMP)** *prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and 'Tool-Box Talks' to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with,* **preservation in situ sites will also be recorded on project live constraints mapping**. *New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted*." *"New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted."* This is what the HEMP would be appropriate for as the DWSI is not the appropriate mechanism for preservation in situ. The DWSI can point to the site wide HEMP, where any new sites identified for preservation in situ can be appended to.	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7, with reference to Preservation in Situ Plan as noted above.
7.22	Archaeology	*The methodology used to allow for the preservation of archaeological evidence is as follows:* *A layer of 10 mm pea shingle is used to fill in any gaps or undulations in the surface of the archaeological remains to a depth of 500 mm above the highest level of the*	his paragraph is incorrect, as Historic England's 2024 Appendix 5 does not prescribe a universal methodology requiring 10 mm pea shingle or a 500 mm cover depth. Instead, the guidance states that the most appropriate reburial material is usually the material excavated from the site. Where additional material is required, it should be selected on a site-specific basis and must meet appropriate criteria, including capillarity, chemical compatibility, compactability, intimate physical contact with the remains, avoidance of mechanical damage, no release of harmful material, and no significant effect on soil or water chemistry. Historic England guidance also does not specifically endorse the use of a D3 low ground pressure machine. Rather than prescribing a particular item of	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		archaeological remains. This ensures that any archaeological features are fully infilled. This is pushed over the remains using a D3 low ground pressure machine. *A layer of permeable geotextile of sufficient quality is laid over the shingle by hand where suitable (geotextile layers will only be used where it is necessary to prevent intermixing of dissimilar soil layers).* *Above the fill and geotextile layer (if appropriate), normal earthwork construction then proceeds.*	plant or a standard method, the methodology should be informed by the results of archaeological investigation and by a site-specific assessment of whether preservation by reburial is appropriate. This assessment should then inform the design of an appropriate reburial strategy, including the method of placing and removing protective material. Historic England's 2024 Appendix 5 further states that the use of geosynthetics should be reviewed carefully and that, although advice is provided on scenarios where they may be appropriate, geosynthetics are generally not needed. SCCAS would therefore recommend the removal of 5.3.9 and 5.3.10 and should be replaces with a paragraph stating that: **Provision for reburial, where appropriate, will follow Historic England (2024, appendix 5) guidance.** This is appropriate for the OAMS-OWSI as appropriate on-site assessment will need to be undertaken to inform reburial of archaeological heritage assets, where it is achievable.	
7.23	Archaeology	5.3.11 *The ACoW will give Tool-Box Talks to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under the DWSI, and generally to ensure that these are put in place and complied with. Following construction, the protective fill material will be removed by the Main Works Contractor(s), under supervision by the Archaeological Contractor(s), leaving the sites in their original condition.*	Temporary burial, construction loading, plant movement, fill placement and subsequent removal all carry potential risks. Historic England's approach is to assess and manage those risks through a site-specific reburial strategy, rather than to assume that there will be no change to the archaeological remains or their preservation environment. SCCAS would also highlight that the removal of protective fill material by the Main Works Contractor has the potential to cause damage if not undertaken under appropriate archaeological control and in accordance with an agreed site-specific preservation methodology. This is a further reason why SCCAS would recommend that the use of imported material and geotextile/geosynthetic membranes should not be assumed as a default approach. This is a further reason why SCCAS would recommend that no imported material and no membrane is used so that the site is returned to its original state immediately following reburial. Please also note that where pea shingle is used as a protective measure over topsoil, any pea shingle compressed into the topsoil, together with fragments of damaged geotextile or membrane, could be considered soil contamination under the Soil Management Plan. This may require remediation works, potentially including a topsoil strip, which would itself have archaeological impacts and would not provide preservation in situ. Therefore, the paragraph should be amended to reflect Historic England's guidance. The methodology should be based on the results of archaeological investigation, an assessment of the significance and condition of the remains, and a site-specific threats and risks assessment. Imported material, geotextiles or other geosynthetics should only be used where their use is specifically justified by the site-specific reburial design, rather than being included as a standard or default protective measure.	This paragraph already states that removal of fill material will be removed under supervision by the Archaeological Contractor(s). With the amendment requested above this addresses the concerns.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
7.24	Archaeology	5.3.13 *The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI). It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process). Requirements for archaeological investigation will be contained within the DWSIs.*	SCCAS would recommend the following the amendment: *The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI),* **and the Historic Environment Management Plan (HEMP).** *It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process). Requirements for archaeological investigation will be contained within the DWSIs* **and the HEMP.**	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7, with reference to Preservation in Situ Plan as noted above.
7.25	Archaeology	5.3.39 *At or before the pre-commencement stage or relevant construction activity, and assuming favourable ground conditions and granted access, additional trial trenching will be carried outundertaken in areas of Project impact that have not previously been trial trenched. The purpose of the archaeological trial trenching will be to determine the presence/absence, extent, DWSIs for mitigation, if required. character, condition and significance of the remains in order to inform*	The OWSI is the control document for post-consent archaeological works and should set out the process by which any outstanding archaeological investigation, evaluation and mitigation will be delivered. Land access should be capable of being secured through the DCO powers, where required and delays or programming constraints resulting from unsuitable ground conditions should be factored into the project delivery timetable. While ground conditions may affect the timing, sequencing or detailed methodology of trial trenching, they should not be presented as a reason why archaeological trial trenching cannot be undertaken. SCCAS therefore advises that references to land access and unsuitable ground conditions as factors preventing archaeological trial trenching should be removed. These matters are project delivery and programming considerations, not justification for omitting archaeological trial trenching where it is otherwise required to inform the archaeological mitigation. SCCAS would therefore recommended the following amendment: *"At or before the pre-commencement stage or relevant construction activity, trial trenching will be undertaken in areas of Project impact that have not previously been trial trenched. The purpose of the archaeological trial trenching will be to determine the presence/absence, extent, character, condition and significance of the remains in order to inform DWSIs for mitigation, if required."*	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.26	Archaeology	5.3.45 *Sites that require detailed archaeological excavation will be identified through a programme of archaeological evaluation*	The extent of mitigation should not be determined solely by a fixed 10m or 20m buffer from known assets identified through geophysical survey and/or trial trenching. Is too fixed and implies that mitigation extents are predetermined, rather than being responsive to what is actually found during the archaeological evaluation.	Paragraph 5.3.45 (now 5.3.44) has been updated to clarify that areas for mitigation will be defined "*having regard to the extent, character, significance and archaeological potential of the remains identified*". The reference to 10 m and 20 m has been retained with the addition of "*a minimum of*" to provide a consistent approach.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		and defined in DWSIs for mitigation. *Mitigation areas will be designed to extend 10m beyond the extent of known assets (through either or both geophysical survey and archaeological trial trenching), unless the assets comprise structural remains or funerary activity, in which case the mitigation area will extend 20 m beyond the known extent of such remains. The mitigation areas will, however, be constrained by the area of Project impact or the Order Limits, whichever is smaller.*	Instead, mitigation areas should be defined through the relevant DWSIs, taking account of the character, extent, significance, preservation and archaeological potential for further, yet to be identified archaeological remains within the evaluated areas. The proposed approach should include contingency for the extension of mitigation areas where significant archaeological remains are identified during stripping or excavation. While provision appears to be made for this in relation to human remains at paragraph 5.3.111, equivalent provision should also be set out here for other classes of significant archaeological remains. Significant archaeological remains could include (but not limited to): Pit groups or clusters structural remains burials (inhumation/cremation) industrial features flint scatters or lithic concentrations settlement related features etc,. The OWSI should therefore allow mitigation areas to be extended, where justified, within the limits of Project impact and/or the Order Limits. This would ensure that mitigation is proportionate to the archaeological significance of the remains encountered, rather than being constrained by a blanket buffer approach. SCCAS would therefore advise the following amendment: 5.3.45 **Mitigation areas will be defined in the relevant DWSIs following archaeological evaluation, having regard to the extent, character, significance and archaeological potential of the remains identified.** And another paragraph should be added to detail limits of extensions: **Where significant archaeological remains are identified during stripping, excavation or other mitigation works, provision will be made in the DWSIs for the mitigation area to be extended, where necessary and practicable, within the area of Project impact or Order Limits, whichever is smaller. Any such extension will be agreed with the relevant LPAAA. As a minimum, this will comprise a 20m extension for funerary and structural remains, and a 10m extension for all other remains, unless otherwise agreed with the relevant LPAAA. This is to establish a 20m or 10m archaeological sterile area from the last archaeological feature.**	The requested additional paragraph is partially included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, as paragraph 5.3.45. This allows for extension where significant remains are identified and where the remains have clear potential to contribute to national or regional research aims, this is to provide clarity on what significant archaeology is. The final sentence of the requested paragraph regarding archaeologically sterile areas has not been included as this is not compatible with defining any extension on the basis of significant archaeology. With the additional wording allowing for extension of mitigation areas this will ensure archaeology is appropriately mitigated.
7.27	Archaeology	5.3.46 *Sites designated for detailed archaeological excavation will be stripped with mechanical plant as set out in the DWSI. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in the DWSI.*	SCCAS would recommend the following amendment for clarity: *Sites designated for detailed archaeological excavation will be stripped with* **back acting mechanical plant of a suitable size, fitted with a toothless ditching bucket no smaller than 1.8m wide,** *as set out in the DWSI. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in the DWSI.* **NB.** The use of dozers and graders is not appropriate for archaeological site stripping.	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
7.28	Archaeology	5.3.47 *For sites where machine stripping is required, topsoil, subsoil and other confirmed non-archaeological overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the first archaeological horizon. The relevant horizon will be informed by the evaluation results, the Research Framework, and the aims and objectives described in the DWSIs.*	SCCAS would like to point out that the Research Framework can inform why an area is being stripped, what initial questions the mitigation should address, and how archaeological remains should be investigated, sampled and recorded. However, it does not inform the physical depth to which a mitigation area should be machine stripped, except in circumstances where deep modern made ground exists. The Research Framework might influence whether the mitigation strategy should be especially alert to, for example, palaeoenvironmental deposits, prehistoric land surfaces, alluvial sequences or deeply buried horizons. However, it does not itself determine that an area should be stripped to a prescribed depth as the correct archaeological horizon is site-specific and may vary across the mitigation area. This wording is also inconsistent with paragraph 5.3.50, where the DWSIs appropriately define the initial research questions. SCCAS therefore recommends the following amendment to provide clarity: *"For sites where machine stripping is required, topsoil, subsoil and other confirmed non-archaeological overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the first archaeological horizon.*	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.
7.29	Archaeology	5.3.54 *The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI, unless archaeological features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, then the excavation area may need to be extended to fulfil the requirements of the DCO and National Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken following consultation with National Grid, the ACoW and the Main Works Contractor(s), in consultation with the relevant Local Planning Authority Archaeological Advisors and where*	SCCAS recommend the following amendment for consistency with 5.3.45 and 5.3.111 and to add clarity to this section: *The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI, unless* **significant** *archaeological* **remains are indicated to continue beyond the excavation area** *and are likely to be subject to construction impact, then the excavation area may need to be extended to fulfil the requirements of the DCO and National Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken following consultation with National Grid, the ACoW and the Main Works Contractor(s), in consultation with the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England.* **As a minimum, this will comprise a 20m extension for funerary and structural remains, and a 10m extension for all other remains, unless otherwise agreed with the relevant LPAAA. This is to establish a 20m or 10m archaeological sterile area from the last archaeological feature.**	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		appropriate Historic England.		
7.30	Archaeology	5.3.126 – 5.3.141 *Geoarchaeological and palaeoenvironmental investigation*	SCCAS will defer comments on this section to Essex and Historic England.	No further comments were received after Deadline 5 from Historic England. The comments from the archaeological advisor to Essex County Council have been actioned and agreed.
7.31	Archaeology	5.3.109 The DWSIs will describe a detailed strategy for the investigation, treatment, recovery and assessment/analysis of human remains (neonate/young infants, inhumations, cremations, disarticulated/charnel remains) which will be developed by the human remains specialist. The DWSIs will also include provision for the identification, excavation, recording and sampling of body stains/shadows, coffin remains and coffin stains/shadows where they exist. Any investigation of human remains must comply with Article 23 of the Draft DCO (document reference 3.1). The investigation of human remains will be undertaken in accordance with national and local guidelines (Historic England, 2018; Advisory Panel on the Archaeology of Burials in England, 2017; Historic England, 2023; McKinley and Roberts, 1993; and McKinley and Brickley, 2004; SCCAS 2026c), under the guidance of the human remains specialist. An appropriate methodology for the recovery of cremated	In light of the fact that there are active discussions as to whether the inspectorate will remove Article 23 from the DCO, as this has happened on other NSIP project (e.g. SeaLINK). SCCAS recommend that the line "*Any investigation of human remains must comply with Article 23 of the Draft DCO (document reference 3.1)."* is replaced with: "*Any investigation of human remains must comply with* **all legal requirements.** As this would cover reversion to the burial act.	The requested update is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, submitted at Deadline 7.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
		human remains will be developed and detailed in the DWSI. At the post-excavation assessment (PXA) stage the Archaeological Contractor(s) will consider the application of modern scientific studies, such as DNA work and isotope analysis. It is expected where other dating cannot be obtained for this material that C-14 will be applied. A programme of full assessment of human remains will be detailed in the Updated Project Design (UPD), which will be approved by the relevant LPAAA and where required Historic England.		
7.32	Archaeology	Appendix B Archaeological Mitigation areas	SCCAS notes the applicant's clarification that the mitigation areas identified in the OAMS-OWSI are based on the current project design, the results of Priority Area geophysical survey and trial trench evaluation, and other known archaeological information. SCCAS also notes that the applicant proposes to review and amend these areas, where required, through consultation with the relevant LPAAA, and that the detailed mitigation methodology would be set out in the relevant DWSI. However, SCCAS remains concerned that the presentation of these areas as "mitigation areas" within the OAMS-OWSI gives them a level of certainty that is not appropriate at this stage. The final agreed mitigation areas will be presented in the relevant DWSI. SCCAS therefore recommends that Appendix B be retitled as "Indicative Priority Area Archaeological Mitigation Areas". SCCAS is still in discussion with the applicant about the extent of the indicative priority area mitigation areas, once these are agreed, this table should be updated to reflect this. The final extent, scope and methodology of archaeological mitigation should be defined within the relevant DWSI following completion, reporting and review of the archaeological evaluation and in consultation with the relevant LPAAA.	Appendix B has been updated to reflect the most recent discussions between the Applicant and SCCAS regarding the proposed mitigation areas in Suffolk. As the appendix already makes clear that these areas are proposed by National Grid and require agreement no further clarification of this point is proposed. Evaluation has been completed, including reporting, of the priority areas in Suffolk so it is appropriate to propose mitigation at this stage.
7.33	Archaeology		SCCAS welcomes the inclusion of Figure 1, however, amendments are required before it can be accepted. The OAMS-OWSI currently defines the "Phase 2 Archaeological Trial Trenching Areas – Not Started" too narrowly. The areas shown in green in the plans do not reflect the full extent of project impacts with the potential to affect buried archaeological heritage assets, including temporary SuDS	In addition to the area identified as 'Phase 2 Archaeological Trial Trenching Areas – Not Started' on Figure 1 of this document the Applicant shared trench plans for the Phase 2 trial trenching with SCCAS for review on 3 June 2026. These plans demonstrate that SuDs are included in the second phase of trial trenching. Those water management features (attenuation ponds/infiltration ponds/SuDs) associated with the priority evaluation areas have been investigated. The SuDs in the Phase 2 evaluation areas have

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant Comments
			ponds. This also risks constraining necessary post-approval design variations. SCCAS therefore recommends that the full red line order limit is identified as the "Phase 2 Archaeological Trial Trenching Areas – Not Started". The key should include a clear clarification that archaeological evaluation will only be required in relation to areas of project impact. The specific areas to be evaluated during Phase 2 should then be defined within the relevant Phase 2 DWSI(s). This approach would provide sufficient flexibility for post-consent works to be informed by final designs, without requiring the OAMS-OWSI to be amended each time a design variation is introduced. It would also ensure that all such variations are appropriately captured and addressed through the DWSI process.	been subject to geophysical survey. All SuDS were considered when designing the Phase 2 trench plans. Trenches have been located within SuDS locations that contained or were close to geophysical anomalies of potential archaeological interest or as part of the survey of apparently blank areas. Not all SuDs are proposed to be trenched as they are part of the 4% sample and it may be more appropriate to trench elsewhere within the Phase 2 evaluation area. The area shown on Figure 1 includes all those construction works that could cause significant ground disturbance. It is not proportionate or reasonable to include the entire Order Limits in the Phase 2 trenching scope, even with a written caveat, as the Order Limits include a large proportion of area where no physical impact is proposed.

Table G.8 7.11.1 (A) Transport Assessment Addendum **[REP5-165]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant comments
8.1	Highways	General	Reviewing additional modelling data.	Noted.

[Please note, the Applicant's response to comments contained in **Table 9** of the SCC response is provided in Appendix A of 8.4.17 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points]

Table G.9 8.9.2 (A) Applicant's Response to Second Written Questions **[REP5-211]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
10.1	Health and Wellbeing	***HW 2.1*** *Communication Strategy In your response to ExQ1 HW1.9 [REP3-074] in relation to Colchester City Council's Local Impact Report (point 5 – a robust health and wellbeing monitoring framework with enforceable commitments) amongst other matters you state: "It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health over the pre-construction,*	SCC (Public Health) notes the Applicant's response to HW 2.1 and welcomes the inclusion of additional commitments within the updated Outline CoCP **[REP5-139]**, in particular commitment GG37 relating to the recording and review of complaints, including themes, actions and escalation times, and complaints management procedure due for submission at Deadline 6. SCC acknowledges that these measures represent a positive step in strengthening the approach to community engagement and in providing a mechanism through which certain indicators of community concern may be captured during the construction phase. SCC suggests that it would be beneficial for the Applicant to clarify within the proposed Complaints Management Procedure, how the outputs from this and other monitoring activity will be analysed, reported, and used to inform adaptive mitigation, beyond identifying where "*additional communication approaches or other action may be required*". In SCC's view, this would strengthen alignment with an adaptive management approach, whereby monitoring is actively used to inform the ongoing refinement of mitigation measures in response to observed effects. The Applicant should also set out	As previously noted in the Applicant's response to HW2.1, the Applicant does not consider there to be a requirement to provide a Health and Wellbeing Monitoring Framework as no significant health and wellbeing impacts have been identified through the EIA process. The Applicant considers that, with a combination of appropriate proactive and reactive engagement activities (i.e. communication of construction activities to affected communities in a timely manner, accompanied by a robust complaints procedure), impacts on community health and wellbeing can be effectively managed. The Applicant considers that the baseline assessment presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP6-053]** is appropriate and in line with good practice guidance.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
		construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and speed of escalation. This would help understand where further communication may be required with local communities". *The suggestions put forward would appear to be applicable across the range of points raised on this issue by a number of local authorities. However, there are no commitments included in the outline CoCP [REP4- 164] or commentary related to such matters in its Appendix E [REP4- 168]. The ExA are of the view that appropriate commitments in the outline CoCP or commentary in Appendix E to set out such approaches would be necessary to bring the suggestions into effect and ensure there were appropriate enforceable commitments in the DCO documentation. The applicant is asked to update either the outline CoCP or appendix E to include suitable wording to bring into effect your suggested actions. If not explain why not.*	a clear governance framework, including responsibilities, decision making processes and escalation routes, to support this approach. Notwithstanding these positive amendments, SCC maintains the position set out throughout the examination, most recently in **[REP5-271]**, that the Applicant's approach does not constitute a comprehensive or sufficiently robust framework for monitoring health and wellbeing impacts. In particular, SCC considers that the measures set out by the Applicant remain primarily focused on communications, engagement and the management of complaints, rather than the systematic monitoring of health and wellbeing outcomes. Whilst complaints data can provide a useful proxy indicator of community concerns, it is inherently reactive and partial, and does not provide a reliable or complete basis for understanding changes in population health and wellbeing over time. There remains no commitment to establish an appropriate baseline, nor to undertake any form of primary data collection or structured monitoring of key health and wellbeing indicators, including those associated with mental wellbeing such as stress, sleep disturbance, perceived control and trust in the project. In the absence of such provision, the ability to detect change over time or to attribute observed effects to the Project is limited. Accordingly, SCC continues to consider that the Outline CoCP should include a clear commitment to the development and implementation of a Health and Wellbeing Monitoring Framework. As previously set out, such a framework should establish an appropriate baseline and enable the detection of change over time, incorporating both quantitative indicators and qualitative community feedback. It should include provision for locally specific data collection to understand lived experience, alongside the use of existing population level datasets. The framework should also provide for regular reporting and defined review points, ensuring that monitoring findings are actively considered throughout the construction phase. It should include mechanisms for escalation and for agreeing further mitigation where adverse effects are identified, thereby enabling an adaptive management approach. Where practicable, the framework should align with monitoring approaches for other relevant NSIPs to support the identification of cumulative and interacting effects.	
10.2	Health and Wellbeing	**Schedules 3, Requirement 7 (Construction Hours)**	SCC (Public Health) acknowledges the additional information provided, including the high-level programme modelling and explanation of construction scheduling assumptions. In particular, SCC notes the Applicant's conclusion	The Applicant acknowledges SCCs comments and responded on this matter at Deadline 6 in Annex A of **8.5.11 Applicant's Written Summary of Oral**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
		The local authorities are maintaining their concerns in regard to this requirement, especially in terms of the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on saturdays, sundays and bank holidays, together with additional start-up and close-down activities outside these hours. The ExA notes the applicant's extensive response to ExQ1 [REP3-074] at question DCO 1.S10, especially at pages 210 and 211, where it states in relation to just removing sundays or bank holidays/ other public holidays "Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely unchanged." The ExA has noted all the justifications put forward by the applicant, as well as the applicant's final sentence in this question where it states "…removal of sundays and/or bank holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the project." The applicant is asked to model the scenarios of removing: a) just sundays b) just bank and other public holidays c) sundays and bank and other public holidays and then confirm whether the	that removal of Sunday working would result in an approximate delay of 9.5 weeks, and that removal of Bank and other public holidays would have no material effect on the programme. SCC also recognises the wider context set out by the Applicant in relation to programme resilience, specialist labour requirements, and the Project's designation as Critical National Priority (CNP) infrastructure. However, SCC maintains that the Applicant's response places disproportionate weight on programme flexibility and delivery risk, without sufficient regard to the role of construction hours as a primary mitigation measure to protect public health and residential amenity. As previously set out, including **[Rep1-178]** and most recently in **[REP5-271]**, the proposed working hours would expose communities to prolonged disturbance, with limited opportunity for predictable and meaningful respite. This is a matter of particular concern given the scale, duration and geographic extent of the Project. SCC notes the Applicant's explanation that Sunday and public holiday working may form part of the "*practical deployment model for specialist labour*", including reference to "*patterns such as 12 days working and two days off in every 14 days*". Whilst SCC recognises that certain specialist activities may require intensive or time constrained working patterns, it does not follow that such requirements necessitate the routine inclusion of Sundays and Bank Holidays within core working hours. SCC considers that such activities could be accommodated through a controlled exception based approach, whereby works outside standard hours are clearly justified, time limited, and agreed in advance with the relevant local authority. Similarly, SCC notes the Applicant's position that "*all other consented electricity transmission Nationally Significant Infrastructure Projects have been granted seven-day working*". SCC considers that current circumstances within Suffolk are materially different to previously consented projects. The county is experiencing, and is expected to continue to experience, a notably high concentration of NSIPs, giving rise to an elevated risk of cumulative and sequential construction impacts. The resulting need for clear, consistent and predictable periods of respite is greater, not less, than previously consented projects. The application of a standardised approach to working hours gleaned from other projects does not adequately account for these locally specific cumulative pressures. SCC also acknowledges the targeted controls referenced by the Applicant, including restrictions on percussive piling and limitations on HGV movements outside defined daytime periods. These controls are welcomed as mitigation for activities known to give rise to higher levels of noise and disturbance. However, SCC emphasises that a wide range of other construction activities can also give rise to material impacts on local communities. Activities that generate sustained noise and vibration, create temporary or repeated severance of routes, restrict access to green space and community assets, introduce ongoing uncertainty and disruption to daily routines. In this context, SCC considers that the reliance on selected activity specific controls alone does not fully address the breadth of potential impacts arising from the overall pattern and duration of construction activity. This reinforces the role of construction working hours as a primary and necessary mitigation measure	**Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117].**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
		energisation date on the baseline construction programme would remain largely unchanged in relation to each of those scenarios. The ExA asks the local authorities to collaborate and provide a single form of wording for this requirement that they consider to be a reasonable compromise that collectively satisfies the concerns being raised in regard to this requirement, so this can assist in informing a discussion at ISH3 into the draft DCO. The wording submitted should include, but not be limited to, the core construction hours specified, start and close down activities and the operations that may take place outside of those core working hours.	to ensure that communities experience regular and predictable periods of respite. In relation to the Applicant's wider justification, including reference to system constraint costs and the Project's CNP designation, SCC considers that CNP does not displace the need to fully apply the mitigation hierarchy. The need case and national policy context do not provide a basis for avoiding or minimising mitigation where this is reasonably practicable in respect of impacts on human health and wellbeing. The establishment of appropriate construction working hours remains a fundamental and effective means of mitigating health effects at source. Accordingly, SCC maintains its position as set out in **[REP5-271]** that construction activity should be limited to Monday to Friday 07:00–19:00 and Saturday 08:00–13:00 and may not occur on Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority.	
10.3	Highways	**TT2.7**	Noted that exceedance of assessed HGV numbers is not considered a non-compliance with the OCTMP.	Section 6.4.1 of **7.3 Outline Construction Traffic Management Plan [REP6-082]** was updated to include "*Construction HGV movements above those included within the Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4) to be reported within the three-month look ahead*" within the enforcement section. This provides clarity that exceedance is to be investigated to understand if corrective actions are required.
10.4	Highways	**TT2.11**	Whilst SCC accepts that there is not a consistent approach to HGV caps on linear DCOs, it is felt that the lack of a cap implies a level of non-confidence by the applicant for their worst case scenario HGV numbers. Examples of DCO's including caps on HGV movements are SPR EA1(N) and EA2, Sizewell C.	The Applicant has provided a response on the robust trip generation and suitability of a vehicle cap within their response to TT2.11 of **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**. The Applicant has committed to implementing robust monitoring and management of the proposed vehicle trips against those assessed within **7.11 Transport Assessment [APP-311]** and **16.4 Environmental Statement Chapter 16: Traffic and Transport [APP-275]** within **7.3 Outline Construction Traffic Management Plan [REP6-082].** The Applicants position is detailed within the Statement of Common Ground.
10.5	Highways	**TT2.12**	Recent experience with delivery of an NSIP has indicated that the Applicant must retain control of AIL hauliers and not sublet movements to them in their entirety. This has resulted in the LHA having to explain the agreed DCO process to another party.	Noted. The Applicant appreciates the insight from recent experience. The Main Works Contractor will liaise with the LHA closer to the time of AIL movements when hauliers have been onboarded. This will ensure they

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
				understand the agreed DCO process and an appropriate management approach has been confirmed.

Table G.10 8.13 (A) Outline Employment and Skills Plan **[REP5-215]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
11.1	Skills	1.1.3, 1.1.5, 7.2.2 – Scope, purpose and reliance on post-consent detail	SCC considers that the OESP does not represent a sufficiently robust or integrated approach to understanding or managing the workforce, skills and supply chain implications of the Project. While the Plan establishes a high-level framework, it defers the definition of core elements—including workforce demand, skills requirements, interventions and delivery mechanisms—to a post-consent stage. This creates a fundamental gap in the evidence base at the point of examination. In SCC's view, this approach prevents a clear understanding of how workforce demand has been derived, how it will change over time across different construction phases, and how this demand translates into specific skills needs and supply chain requirements. Without this information, it is not possible to establish whether the proposed approach is proportionate, deliverable or capable of responding to identified labour market constraints. SCC also does not agree with the characterisation of the OESP solely as a benefits-led document. Workforce demand associated with NSIPs has the potential to give rise to adverse effects, including labour displacement, wage inflation and pressure on local services. The positioning of the OESP as a benefits-focused plan risks overlooking the need to identify, assess and mitigate such impacts in accordance with the mitigation hierarchy. These issues are compounded by the proposed approach to securing the Final ESP, which requires submission "for information" only. SCC considers that this does not provide an adequate mechanism to ensure that the ESP is robust, evidence-led or aligned with local and regional priorities. In this context, the ESP cannot currently be relied upon as an effective control or mitigation mechanism.	The Applicant does not agree that the OESP lacks a sufficiently robust framework for workforce, skills and supply chain matters. 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, skills or supply chain effects. Socio-economic effects are assessed separately within the are assessed separately in **15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070].** The Applicant also does not agree that workforce and supply chain considerations have not been adequately considered. **8.13 Outline Employment and Skills Plan [Revision B]** has been strengthened during the Examination to include commitments relating to workforce planning, collaboration with the Regional Skills Coordination Function (RSCF), local authorities and other project promoters, and the sharing of workforce and supply chain intelligence. National Grid has also established the Great Grid Partnership (GGP), enabling early contractor appointment, workforce planning and resource management across the wider Accelerated Strategic Transmission Investment (ASTI) programme. Known shortages in specialist transmission roles are actively managed across the wider portfolio, whilst the predominant overlap with other major infrastructure projects is expected to be in relation to civils construction activities, where there is no identified shortage of skills or supply chain capacity. Furthermore, the Project's peak workforce is substantially lower than that associated with projects such as Sizewell C. The Applicant does not agree that the OESP should function as a mitigation document. No significant adverse socio-economic effects requiring mitigation have been identified within the ES and the OESP is therefore appropriately focused on maximising employment, skills and supply chain opportunities arising from the Project. Notwithstanding the above, the Applicant recognises that successful delivery of the Final ESP will require partnership working with the county and unitary authorities, as well as local and regional skills and education providers. As such it is important that the parties are in agreement as to the actions and management measures that will be proposed within the document. On this basis therefore the Applicant has amended Requirement 15 (see **3.1 Draft DCO [Revision G]**) such that the Final ESP, which is to be consistent in scope with the OESP, is to be approved by the relevant host county and unitary authorities prior to the commencement of development.
11.2	Skills	2.1, 2.3 Figure 2.1 Sections 3 and 4 –	SCC considers that the OESP is not underpinned by a sufficiently robust or detailed evidence base to support the assessment of workforce and labour	The Applicant does not agree that the OESP is unsupported by an adequate evidence base. The OESP is an outline, benefit-led document which

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		Workforce evidence base, modelling and labour market capacity	market impacts. While headline job numbers and indicative peak workforce figures are provided, these are not supported by detailed, phase-specific modelling or clear assumptions regarding workforce composition, skills requirements or spatial distribution. In particular, the absence of scenario-based modelling, including a reasonable worst-case workforce scenario, represents a critical gap. The OESP does not provide a clear understanding of how workforce demand will vary over time, including the timing and intensity of peak demand, nor how this will interact with existing labour market capacity. Without this, it is not possible to assess the scale, timing or geographical distribution of impacts. The assumption that approximately 10% of the workforce will be locally sourced is not supported by a clear evidential basis or delivery strategy. Nor is there sufficient analysis of whether the local labour market has the capacity to absorb this demand. While the OESP describes the labour market baseline, it does not test supply against demand or consider how workforce requirements will interact with existing employment, replacement demand and other infrastructure activity. SCC therefore considers that, in the absence of robust, phase-specific and scenario-based evidence, it is not possible to determine the scale or significance of labour market effects. This, in turn, undermines the robustness of the Environmental Statement conclusions that no significant adverse effects would arise.	establishes the framework and commitments that will guide development of the Final ESP. It is not intended to provide a detailed assessment of workforce, skills or supply chain effects. Socio-economic effects are assessed separately within **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 does not agree that workforce and labour market considerations have not been adequately considered. The OESP identifies the anticipated scale of workforce demand, including peak workforce requirements and their distribution across the construction programme. Workforce demand should also be considered in the context of the scale and nature of the Project. Whilst Norwich to Tilbury represents a significant infrastructure investment, its peak construction workforce is substantially lower than that associated with projects such as Sizewell C. General civils construction activities are expected to represent the predominant area of overlap with other NSIPs and the Applicant is confident in the capacity of the civils supply chain. National Grid has established the GGP, enabling early contractor appointment, workforce planning and resource management across the wider ASTI programme. Known shortages in specialist transmission roles are proactively managed across the wider portfolio and the OESP has been strengthened to include additional commitments relating to workforce planning, collaboration with the RSCF, coordination with other project promoters, and the sharing of workforce and supply chain intelligence. The Applicant therefore does not agree that the conclusions of the ES are undermined. The ES provides a robust basis for the assessment of socio-economic effects, whilst the OESP provides an appropriate framework for the development and delivery of employment, skills and supply chain initiatives through the Final ESP.
11.3	Skills	4, 6 and 2.3 – Cumulative effects, displacement and interaction with wider growth	SCC agrees that the OESP identifies the existence of skills shortages and acknowledges the presence of multiple NSIPs drawing on a shared labour pool. However, this context is not translated into a quantified or evidence-led assessment of cumulative effects. The OESP does not assess how workforce demand from this Project will overlap temporally or spatially with other infrastructure projects, nor how peak demand periods may coincide. There is no modelling of cumulative labour demand, no assessment of supply chain constraints under stress, and no analysis of labour displacement effects. As a result, key risks—including labour market saturation, displacement from other sectors, and inflationary pressures—are not properly understood or assessed. SCC further notes that the OESP does not consider the interaction between NSIP demand and wider growth pressures, including housing delivery, port activity and regeneration programmes. These sources of demand are likely to compete for the same labour and supply chain capacity but are not incorporated into a comprehensive assessment. In the absence of a quantified, evidence-led cumulative assessment, SCC considers that cumulative labour market effects are not properly assessed or managed.	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, skills or supply chain effects. Socio-economic effects are assessed separately within **15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070].** The Applicant does not agree that cumulative labour market effects have not been adequately considered. The OESP recognises the cumulative context within which the Project will be delivered and has been strengthened at Deadline 7 (**8.13 Outline Employment and Skills Plan [Revision B]**) to include commitments to work collaboratively with the RSCF, local authorities and other project promoters to support workforce planning, share supply chain intelligence and coordinate activities where feasible. National Grid has also established the GGP, enabling early contractor appointment, workforce planning and resource management across the wider ASTI programme. Known shortages in specialist transmission roles are actively managed across the wider portfolio, whilst the principal overlap with other major infrastructure projects is expected to be in relation to civils

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				construction activities, where there is no identified shortage of skills or supply chain capacity. The Applicant therefore considers that cumulative workforce and supply chain pressures have been appropriately considered in the OESP.
11.4	Skills	2.5, 6.1–6.3 – Supply chain, skills delivery and intervention design	SCC considers that the OESP does not adequately address the interrelationship between workforce demand, skills provision and supply chain delivery. While each element is discussed individually, the Plan does not treat these as a coordinated system. There is no clear line of sight demonstrating how workforce demand translates into specific skills requirements, how these are met through targeted interventions, and how this in turn enables supply chain participation. This lack of integration is a fundamental weakness, as supply chain delivery is inherently dependent on the availability of a suitably skilled workforce. The proposed interventions are high-level and aspirational, and are not linked to quantified demand. The OESP relies heavily on existing national programmes but does not demonstrate how these will be scaled or adapted to meet the specific needs of the Project. Nor does it assess the transferability of existing skills or identify where targeted retraining is required. The OESP also acknowledges that training provision may not deliver the required skills within the timeframe for construction, which raises further questions as to the realism of assumptions regarding local labour participation. SCC therefore considers that the OESP does not currently function as an integrated workforce, skills and supply chain strategy, and does not provide confidence that impacts can be effectively managed or that opportunities can be realised.	The Applicant does not agree that the OESP fails to address the relationship between workforce demand, skills provision and supply chain delivery. The OESP has been prepared specifically to bring these matters together through a coordinated framework of workforce planning, skills development and business engagement, supported by collaboration with local authorities, the RSCF, education providers and industry partners. The OESP has been updated at Deadline 7 to strengthen commitments relating to engagement with local authorities, employment and skills organisations, the RSCF, and other major infrastructure project promoters. Sections 6 and 7 of the **8.13 Outline Employment and Skills Plan [Revision B]** set out the proposed approach to collaboration, preparation of the Final ESP, delivery arrangements and stakeholder engagement. The Applicant also notes that the Project's workforce requirements should be considered in the context of the scale and nature of the development. Whilst the Project represents a significant infrastructure investment, its peak construction workforce is substantially lower than that associated with major projects such as Sizewell C. National Grid has also established the GGP, enabling early contractor appointment, workforce planning and resource management across the wider ASTI programme. Known shortages in specialist transmission roles are actively managed across the wider portfolio, whilst the predominant overlap with other major infrastructure projects is expected to be in relation to civils construction activities, where there is no identified shortage of skills or supply chain capacity. The Applicant therefore considers that the OESP provides an appropriate framework through which workforce, skills and supply chain opportunities can be coordinated and delivered.
11.5	Skills	2.2, 2.3.5 and 4 – Spatial and infrastructure impacts	SCC notes that the spatial definition of the Study Area is broad and does not distinguish clearly between local, sub-regional and regional labour markets. This limits the ability to understand how impacts will be distributed geographically and may mask localised capacity constraints. In addition, the OESP does not sufficiently consider the temporal distribution of workforce demand or the implications of peak activity. There is limited assessment of how workforce peaks may align with other projects, or how this may give rise to short-term but significant pressures on accommodation, transport networks and local services. While increased spending is identified as a potential benefit, the OESP does not assess associated pressures, including affordability impacts or displacement within local markets. These effects are relevant to understanding the full socio-economic impact of the Project and should be assessed alongside labour market effects.	The Applicant does not agree that the Study Area is inappropriately broad. The Applicant does not agree that the Study Area is inappropriately broad. The OESP adopts the Wider Study Area used within **6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]** and reflects the geographic extent of the Project and the operation of employment, skills and supply chain markets across local authority boundaries. The OESP expressly recognises variations in economic and labour market characteristics across the Study Area and, where appropriate, analyses data separately for Norfolk, Suffolk and Essex (including Thurrock) sub-study areas. The OESP is not intended to provide a detailed assessment of socio-economic effects or labour market impacts at differing geographic scales, as these matters are assessed separately within **6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]**. Rather, it establishes the framework through which employment, skills and supply chain opportunities will be maximised.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
11.6	Skills	6.4 and 7 – Governance, coordination and role of the RSCF	SCC welcomes recognition of the Regional Skills Coordination Function (RSCF) but considers that its role is insufficiently defined and largely deferred to a post-consent stage. Effective management of labour market impacts—particularly in a cumulative context—requires early, structured and ongoing coordination. The OESP does not provide a clear governance framework, including defined roles, responsibilities or decision-making processes. Nor does it establish how coordination across multiple contractors and projects will be achieved in practice. This creates a risk of fragmented and inconsistent delivery. SCC considers that a clear governance structure is required, with defined arrangements for coordination, monitoring and ongoing management of the ESP. This is particularly important given the dynamic nature of labour markets and the likelihood of changing conditions over the construction period.	The Applicant notes Suffolk County Council's comments regarding governance, engagement and coordination. In response to consultation and examination discussions, the OESP has been updated at Deadline 7 to strengthen commitments relating to engagement with local authorities, employment and skills organisations, the RSCF, and other major infrastructure project promoters. Sections 6 and 7 of the **8.13 Outline Employment and Skills Plan [Revision B]** set out the proposed approach to collaboration, preparation of the Final ESP, delivery arrangements and stakeholder engagement. The OESP establishes the governance framework and process through which monitoring, reporting and review arrangements will be developed as part of the Final ESP. The Applicant considers that the Final ESP is the appropriate mechanism through which detailed targets and performance measures should be established, reflecting the workforce, informed by contractor inputs and the latest workforce and procurement information available prior to construction. Furthermore, Requirement 15 (see **3.1 Draft DCO [Revision G]**) has been amended to require approval of the Final ESP by the relevant host county and unitary authorities prior to commencement of development. The Applicant therefore considers that an appropriate framework is in place to support ongoing governance, coordination and delivery of the Final ESP.
11.7	Skills	6 and 7 – Monitoring, targets and enforceability	SCC considers that the OESP lacks a clear and enforceable framework for monitoring, reporting and performance management. There are no defined targets, key performance indicators or measurable outcomes for employment, skills or supply chain delivery. There is also no clear baseline against which success can be measured, nor a structured framework for data collection, reporting or review. In the absence of these elements, it is not possible to assess whether the ESP is delivering its intended outcomes or to identify and respond to emerging issues. SCC considers that the ESP must function as a delivery tool rather than a statement of intent. This requires clearly defined targets, measurable indicators, regular reporting and mechanisms for review and intervention where necessary. Given the reliance on the ESP as a key mechanism for managing socio-economic effects, these deficiencies raise significant concerns regarding the precision, effectiveness and enforceability of the proposed DCO Requirement.	The Applicant notes Suffolk County Council's comments regarding monitoring, reporting and performance. In response to consultation and examination discussions, the OESP has been updated at Deadline 7 to strengthen commitments relating to engagement with local authorities, employment and skills organisations, the RSCF and other major infrastructure project promoters. Sections 6 and 7 of **8.13 Outline Employment and Skills Plan [Revision B]** set out the proposed approach to collaboration, preparation of the Final ESP, delivery arrangements, stakeholder engagement and governance. The OESP also establishes the framework through which monitoring, reporting and review arrangements will be developed as part of the Final ESP, including the appointment of an Employment and Skills Coordinator and establishment of a stakeholder group to support implementation and oversight. The Applicant considers that the Final ESP is the appropriate mechanism through which detailed targets, performance measures and monitoring arrangements should be established, informed by contractor inputs and the most up-to-date workforce, procurement and supply chain information available prior to construction. Furthermore, Requirement 15 (see **3.1 Draft DCO [Revision G]**) has been amended to require approval of the Final ESP by the relevant host county and unitary authorities prior to commencement of development. The Applicant therefore considers that an appropriate framework is in place to support the governance, monitoring, review and delivery of the Final ESP.

Table G.11 8.18 (A) Detailed Written Scheme of Investigation - Mitigation areas 102 (a, b, c & d) & 146 (1) **[REP5-217]**; 8.19 (A) Detailed Written Scheme of Investigation - Mitigation area 103 **[REP5-218];** 8.20 (A) Detailed Written Scheme of Investigation - Mitigation areas 122 and 123 **[REP5-219]**

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
12.1	Archaeology	General	The SCCAS comments that follow are general comments as all three submitted DWSIs for Suffolk Priority Areas use the same broad DWSI document model. Amendments have been requested for **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162]** which will impact the content of the DWSI, and further amendments to the DWSIs maybe required because of this. The mitigation areas do not reflect those that have been discussed with the applicant in a meeting held on 11 June 2026, SCCAS do not believe the mitigation areas as represented provide adequate mitigation and heritage protections form the impacts of the development. Therefore, the DWSIs cannot be approved at this stage.	Mitigation areas have been updated following the meeting held on June 11th. The areas presented provide a proportionate response to SCCAS comments in order to provide adequate mitigation and heritage protections from the impacts of development.
12.2	Archaeology	**1.5 Project Roles**	**Paragraph 1.5.1** should be amended to provide clarity: *National Grid will be responsible for instructing the works and providing necessary information on scope* **of development impacts, including accurate and up-to-date plans for the development.** **Paragraph 1.5.2** should have the ACoW added in as the liaison between the Main Works Contractor, National Grid and SCCAS. SCCAS would recommend the following addition: *The 'Main Works Contractor' will be responsible for control of the Site and all contractors on it during the construction phase. The Main Works Contractor, when appointed* **in consultation with the ACoW team**, *will oversee all stages of work with responsibility for health and safety, welfare and site security, and will ensure that appropriate temporary works required to facilitate the archaeological work are in place.* **Paragraph 1.5.3** should be amended to clearly define the role and responsibility of the ACoW within the project. *The Archaeological Clerk of Works (ACoW) team will be appointed by National Grid and will act on its behalf to monitor the implementation of archaeological mitigation measures.* **The ACoW team will act as the principal liaison between National Grid, the Main Works Contractor and SCCAS in relation to the planning, coordination, monitoring, progress and sign-off of the archaeological works.** *An ACoW team will be on site for the duration of the works to oversee the* **progress of the** *archaeological works and ensure that all archaeological works are undertaken in compliance with the* **O***AMS-OWSI and relevant DWSIs. An ACoW team will be responsible for liaising with the LPA Archaeological Advisor on behalf of National Grid in accordance with the roles and responsibilities set out in the AMS-OWSI (Section 1.7).* **Paragraph 1.5.5** should be amended to state that SCCAS is the responsible body for monitoring the archaeological works to ensure compliance with the requirements of the DCO. SCCAS would recommend the following amendment: *Suffolk County Council Archaeological Service (SCCAS) is the LPA*	Requested changes have been actioned

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			Archaeological Advisor, responsible for **monitoring the archaeological works, and** *confirming that the requirements of the DCO are met and for sign-off of the archaeological works, in accordance with the* **O***AMS-OWSI* **and DWSI.** **Paragraph 1.5.6** This needs amending as it is clearly set out in the OAMS-OWSI that the only archive repository in Suffolk is the Suffolk County Council Archaeology Archive. There are no museums in Suffolk that currently meet the appropriate requirements for long term storage of an archaeological archive, and it is the Suffolk County Council Historic Environment Record which issues the parish codes. *The archaeological contractor will establish the project archive repository***, in the case of Suffolk this will be the Suffolk County Council Archaeological Archive,** *prior to starting the work* **and will contact the Suffolk County Council Historic Environment Record to** *be assigned a unique project reference number ('parish code').*	
12.3	Archaeology	**3.2 Archaeological Detailed Excavation Areas**	**Section 3.2** None of the proposed mitigation areas within the DWSIs are currently agreed. This section and corresponding plans (appendix A) will need amending in accordance with the meeting held between SCCAS and the Applicant on 11th June 2026.	Mitigation areas have been updated following the meeting held on 11 June 2026. The areas presented provide a proportionate response to SCCAS comments in order to provide adequate mitigation and heritage protections from the impacts of development.
12.4	Archaeology	**4.1 Research agenda**	**Paragraph 4.1.1** states that "The research questions, aims and objectives will be subject to ongoing review during the mitigation works and may be refined as appropriate in response to emerging results, subject to agreement with SCCAS and The Client." This should be amended to the following: The research questions, aims and objectives will be subject to ongoing review during the mitigation works and may be refined as appropriate in response to emerging results, subject to agreement with SCCAS **and in consultation with** tthe Client **Paragraph 4.1.3** add in a bullet points stating: **The approach adopted for the site will remain flexible to accommodate new discoveries and emerging research priorities identified during the mitigation works.** **Paragraph 4.1.4** another bullet point stating: **Additional research aims may be developed during the course of the archaeological mitigation, including during fieldwork and post-excavation work, in accordance with the principles set out in the OAMS-OWSI and subject to agreement with SCCAS.** **Paragraph 4.1.5** add an additional bullet point to stating: **These objectives represent the current research priorities for investigation but may be supplemented or refined in response to the results of archaeological fieldwork and post-excavation assessment.**	The requested changes have been actioned.
12.5	Archaeology	**5.1 Standards for Archaeological Work**	Since the DWSIs do not identify the archaeological contractor who will undertake the mitigation works and states that the following will be detailed in a contractor method statement:	Requested changes have been actioned

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			• environmental sampling, • scientific dating, – finds procedures for the recovery, treatment and storage of artefactual and ecofactual material, • list of appropriately experienced specialists (with regional expertise), • detailed programme of work, • data management plan, • contractor site specific health and safety and risk assessment, • insurance, • staff provision, • preparation of the archive for deposition • parish codes Therefore, there must be a mechanism in the DWSI by which the Contractor Method Statement can be reviewed and approved by the LPAAA. SCCAS therefore advise the following amendment in **paragraph 5.1.3**: 5.1.3 Prior to the commencement of works, the appointed archaeological contractor will prepare a site-specific **archaeological contractor** method statement **(SSACMS)** for the archaeological mitigation area set out within this DWSI. This will **be in general accordance with** the standards set out within this DWSI, and the AMS-OWSI. The **SSACMS** will include a full programme for the archaeological work that would be referenced against key milestones and events in the overall design and construction programme. All work will comply with relevant standards and technical guidance (Chartered Institute for Archaeologists, 2023 (Ref 9 and Ref 10); SCCAS, 2026 (Ref 23). **National Grid's Archaeological Advisor will submit the DWSIs to the LPA for approval subject to review by the appropriate LPAAA and where required Historic England. Where a SSACMS is required under the DWSI, the SSACMS shall be submitted to the LPAAA for review and approval. Archaeological fieldwork shall not commence until an approved DWSI, and where appropriate SSACMS, is in place.** This closes the procedural gap created by the submitted DWSIs and ensures key archaeological mitigation details, which are deferred in the DWSIs, remain within the formal archaeological approval process. **Paragraph 5.1.4** The statement "and any other factors that may affect delivery" can be read as relating to the construction project delivery, and there needs to be clarity that it relates to delivery of the archaeological fieldwork, the DWSI also identifies other aspects of the archaeological project that will be detailed in the SSACMS, and therefore should be included in paragraph 5.1.4, see below: 5.1.4 The **site-specific archaeological contractor method statement** must include: • A detailed programme of work that sets out the proposed sequence of tasks, anticipated timescales, staffing arrangements, and any other factors that may affect delivery **of the archaeological fieldwork (e.g. water management, adverse weather conditions etc.).**	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			• **list of appropriately experienced specialists (with regional expertise),** – finds procedures for the recovery, treatment and storage of artefactual and ecofactual material, • environmental sampling, • scientific dating, • details of appropriate plant – A Data Management Plan which will describe the type of data that will be acquired and/or generated during the project, the way the data will be managed and stored, and the mechanisms to be employed to preserve and share the data. – The site-specific Health and Safety arrangements that outline the main risks associated with the works and control measures to mitigate these. Information on inductions, PPE, welfare, access, and emergencies will be included. • Confirmation of insurances that cover the planned works. • The number of staff and the relevant staff CVs. – Identification of the archive repository, for Suffolk this will be the Suffolk County Council – Archaeological Archive. • The specific parish codes that will be used during the project.	
12.6	Archaeology	**5.2 Detailed Excavation,** **5.3 Environmental Sampling and Scientific Dating,** **5.4 Finds Processing, Conservation and Human Remains**	The methodology set out here will need amending to reflect the amendments to the OAMS-OWSI, see SCCAS comments on document **7.5 The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162]** and will all need to be significantly expanded upon in the Archaeological Contractor Method Statements.	The requested changes have been actioned.
12.7	Archaeology	**5.5 Communication, Monitoring and Sign-Off**	**Paragraph 5.5.1** it is the responsibility of SCCAS to monitor the archaeological mitigation works for compliance with the requirements in the DCO. Therefore, SCCAS would recommend the following amendments: All archaeological works will be subject to monitoring by the ACoW team **and SCCAS,** and sign-off by SCCAS, in accordance with the AMS-OWSI (Ref 6): • Archaeological areas will remain under archaeological control until formally agreed as completed and **written sign-off has been received from SCCAS.** • **The ACoW will be responsible for ensuring access for SCCAS to complete site monitoring visits.** • Clear communication will be maintained between the archaeological contractor**, SCCAS** and construction teams via the ACoW team. • Areas will only be released once archaeological works have been signed off by SCCAS.	Paragraphs 5.5.1-5.5.4 actioned

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			Paragraph 5.5.3 SCCAS should be included in the weekly summary progress memo, as this will facilitate smooth delivery of the archaeological fieldwork. SCCAS recommend the following amendment to 5.5.3: The archaeological contractor will provide The Client, ACoW team and, SCCAS, with a weekly summary progress memo (1–2 pages). This will: • Summarise the work undertaken during the week and the key findings. • Report on site attendance, where appropriate. • Confirm that the work will be completed to programme and identify any potential issues to programme. • dentify any health and safety issues (including near miss). • Post Excavation Programming, following fieldwork. **Paragraph 5.5.4** This is not the sole responsibility of the ACoW, SCCAS would recommend the following amendment for clarity: *The archaeological contractor will provide all information reasonably practicable to the ACoW team* **for forwarding to SCCAS** *to enable them to monitor compliance with this DWSI – e.g. site surveys, intervention plans, records and finds data etc.* **Paragraph 5.5.5** Please see comments on **7.5 The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162]** and amened appropriately.	
12.8	Archaeology	**5.6 Post-Excavation, Reporting and Archiving**	This section is very light on detail for a DWSI, and should be improved, this would usually not be something that would be developed within a site-specific archaeological contractor's method statement. The OAMS-OWSI states that an archiving strategy, including digital data, will be developed prior to the preparation of any DWSIs, this is not included in the DWSI and further detail is required regarding archiving strategy. SCCAS would recommend the following amendments: 5.6.1 Post-excavation works will be undertaken in accordance with the AMS-OWSI Section 6.3 (Ref 6) and SCCAS requirements (2026 (Ref 23)) *and will include:* **5.6.2** Within *six weeks* of the end of fieldwork a written timetable for post-excavation assessment, updated project design and/or reporting must be produced, which must be approved by SCCAS. Following this, a written statement of progress on post-excavation work – whether assessment, analysis, report writing and publication or archiving – will be required at regular intervals. **5.6.3** A post-excavation assessment (PXA) report on the fieldwork should be prepared in accordance with the principles of *Management of Research Projects in the Historic Environment (MoRPHE)* (Historic England 2015), and the PXA must present a clear and concise assessment of the archaeological value and significance of the results, and identifies the research potential, in the context of the Regional Research Framework which is available online at https://researchframeworks.org/eoe/ (see also *East Anglian Archaeology*, Occasional Papers 3, 8 and 24, 1997, 2000 and 2011). **5.6.4** The PXA will act as a critically assessed audit of the archaeological evidence from the site; see ALGAO *Advice Note for Post Excavation*	The requested changes have been actioned

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			Assessment (2015) *to be submitted within six months of completion of the archaeological mitigation for relevant development stage, unless otherwise agreed in writing with the Client and SCCAS* **and in consultation with National Grid.** **5.6.5** *An updated project design (UPD), to be completed within one year of completion of the archaeological mitigation for the relevant development stage*. **T**his must be prepared in accordance with the principles of *Management of Research Projects in the Historic Environment (MoRPHE)* (Historic England 2015) and contain a timetable, for analysis, dissemination and archive deposition. The UPD will *provide the basis for measurable standards* for SCCAS to monitor this work. **5.6.6** An archive of all records and finds is to be prepared, consistent with the principles of *MoRPHE*. It must be adequate to perform the function of a final archive for deposition in the Archaeological Store of SCCAS (see Archaeological Archives Forum: a guide to best practice 2007). **5.6.7** Finds must be appropriately conserved and stored in accordance with guidelines from *The Institute of Conservation* (ICON). **5.6.8** National Grid must get the agreement of the landowner(s) to the deposition of the site archive, and transfer of title, with SCC County Archaeology Store. **5.6.9** The commissioned archaeological contractor should consult SCCAS Archaeological Store before the archive is prepared regarding the specific requirements for the archive deposition and curation, and regarding any specific cost implications of deposition. A clear statement of the form, intended content, and standards of the archive is to be submitted for approval with SCCAS and comply with SCCAS Guidelines for Archive Preparation and Deposition (2026). **5.6.10** The PXA should offer a statement of significance for retention, based on specialist advice, and - where it is justified – the UPD should propose a discard strategy. This must be agreed with SCCAS prior to implementation. 5.6.11 Archive deposition charges will be charged at the Post Excavation Assessment (PXA) and Updated Project Design (UPD) stage of work, prior to the relevant requirement the site being signed off for that development stage. **5.6.12** The UPD shall state proposals for the deposition of the digital archive relating to this project with the Archaeology Data Service (ADS), adhering to the requirements for digital archives set out in SCCAS Guidelines for Archive Preparation and Deposition 2026, and allowance should be made for costs incurred to ensure proper deposition (http://ads.ahds.ac.uk/project/policy.html). **5.6.13** All Suffolk sites will be accessed via an ADS Suffolk Landing Page. Therefore, when depositing data from Suffolk sites, ADS will need to be informed that the site will need to be added to the Suffolk page. **5.6.14** Following acceptance, a digital copy of the approved final report should be submitted to the Suffolk Historic Environment Record. **5.6.15** Digital vector plans of mitigation areas, recorded archaeological features and excavated sections, should be provided as georeferenced (EPSG: 27700) ESRI shape or QGIS GPK files. These files should have the relevant attributes attached to them including; HER Parish Code, Primary Reference Number eg (Section Number; Context Number; Sample Number;	

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			Small Find number; etc); Group or Feature Number; Archaeological Periods and Phases. These GIS files should be provided to the Suffolk HER following approval of the final report. **5.6.16** At the start of work (immediately before fieldwork commences) an OASIS online record http://ads.ahds.ac.uk/project/oasis/ must be initiated and key fields completed on Details, Location and Creators forms. When the project is completed, all parts of the OASIS online form must be completed, and a copy must be included in the final report and also with the site archive. A .pdf version of the entire report should be uploaded to the OASIS website. **Paragraph 5.6.1** states that the Post Excavation Assessment Report (PXA) would be submitted within six months of the completion of the archaeological mitigation for the relevant development stage, and states that the Updated Project Design (UPD) would be completed within one year of the completion of the archaeological mitigation for relevant development stage. This is unusual, as standardly a stage UPD is incorporated into the PXA, and this is drawn together into a larger UPD for the entire project at a later stage. SCCAS would like to raise this at this stage as the applicant may wish to reconsider how this is set out as this would interrupt delivery of the post-excavation programme. **Paragraph 5.6.2** should have an amendment to highlight the incorporation of site specific PXA and UPD into the wider project UPD: All results will be: • Integrated into the wider **Updated Project Design**. • Assessed against the East of England Research Framework (ERF) (Ref 2) • Made available through dissemination and reporting and appropriate to the significance of the archaeology identified. As a minimum, a summary report must be prepared, in the established format, suitable for inclusion in the annual 'Archaeology in Suffolk' section of the *Proceedings of the Suffolk Institute of Archaeology and History*. It should be included in the project report, or submitted to SCCAS/CT, by the end of the calendar year in which the work takes place, whichever is the sooner	
12.9	Archaeology	**6. Programme, staffing and attendance**	**Paragraph 6.1.2** refers to an "archaeological fieldwork subcontractor" providing the detailed programme, staffing resources and CVs through a method statement. This terminology is inconsistent with the defined role of the "Archaeological Contractor" used elsewhere in the DWSI. For clarity and consistency, "archaeological fieldwork subcontractor" should be amended to "Archaeological Contractor", unless a separate subcontractor role is intended, in which case that role should be clearly defined.	The requested changes have been actioned.
12.10	Archaeology	**7. Health, Safety, Security and Environmental (HSSE)**	**Paragraph 7.1.1** The Main Works Contractor and the Archaeological Contractor should take all reasonable steps to facilitate the completion of the archaeological excavation whilst complying with safe working practices. Therefore, SCCAS would recommend the following addition: *Health and Safety will take priority over all other requirements. A conditional aspect of all archaeological work is both safe access to the area of work and a safe working environment. The project will be carried out in accordance with safe working practices. The Main Works*	Paragraphs 7.1.1 and 7.1.6 actioned. With regards to comments on paragraph 7.1.3, arranging security does not fall within the remit of the ACoW - this would not be appropriate given the roles defined within CDM regulations.

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's comments
			Contractor and the Archaeological Contractor should take all reasonable steps to facilitate the completion of the archaeological excavation, to appropriate standards, whilst complying with safe working practices. **Paragraph 7.1.3** Question: should this not be the responsibility of the ACoW rather than the archaeological contractor? As security should be a scheme wide consideration and this may prove difficult if multiple archaeological contractors are working on the project. **Paragraph 7.1.6** add in an additional bullet point: • The RAMS must be kept under continuous review and amended to reflect changes in site conditions, working methods, hazards or control measures change, or following an incident or near miss. Any amendments will be subject to appropriate review and approval before the affected works proceed.	

Appendix H National Protective Security Authority Guidance: Operational Requirements, August 2018

nationalgrid

National Protective Security Authority

GUIDANCE

Operational Requirements

Principles of assessing and implementing effective protective security

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Operational Requirements

Executive Summary

Operational Requirements (OR) are an essential tool to enable an organisation to produce a clear, considered and high level statement of their security needs based on the risks they face.

A well-defined OR increases the likelihood of success in any security project and reduces the risk of commissioning expensive nugatory work. The involvement of key stakeholders in the OR process will increase executive buy-in for the project, simplifying any organisational change required.

Two worked examples on the NPSA website provide a guide to the production of a well-defined OR (for physical and personnel and people protective security mitigations) which is clearly linked to an organisation's security risks. Reflected within this document is the knowledge and experience collated by NPSA from a wide range of organisations across the national infrastructure and crowded places communities.

Blank Excel Templates for the OR process are available on the NPSA website.

Whilst NPSA refers to this process as Operational Requirements, other organisations may refer to similar processes, such as statement of needs, statement of requirements or statement of purpose, but they all have the same objective, which is to provide a single, high level auditable document.

Why Develop an Operational Requirement?

Before designing or implementing any security scheme or measure, security managers and practitioners should first read this guidance and understand the wider context in which it exists.

NPSA has recommended the use of an OR process for many years. The development of this process is based on observing projects where security requirements were poorly defined or developed in isolation. Where NPSA has been asked to assist in failing security projects, in almost all cases an OR process has not been followed. In many cases a comprehensive risk assessment is also absent which is why NPSA recommends completing both risk assessments and the OR process as an essential part of any security project.

Where a suitable OR process is used, projects have a significantly higher success rate and stakeholders are better engaged in the security measures implemented.

The OR process helps organisations make smarter investments in protective security measures, enabling them to implement measures which are in proportion to the risks they face. By following the process, security managers and practitioners are able to assess, develop and justify the actions their organisation needs to take, and the investments they need to make to protect against security threats.

At the end of the process an organisation will have a clear, prioritised list of protective security recommendations, which span the security disciplines[1] and where multiple measures are complementary. This interdisciplinary approach provides a more robust security outcome. A systematic and thorough assessment will help to support any business case and provide clear evidence of the need for the measures and their likelihood of success.

NPSA has received the following feedback from those using the OR process:

The design solutions are now fit for purpose, time is being saved, plus it is a more efficient way of working with project teams and all stakeholders, encouraging sites to adopt 'fit for purpose' measures through accurate identification of the problem that needs addressing and adopting pragmatic success criteria for the project once it is complete.

[1] Physical, Personnel and People, Cyber and Technical Protective Security.

Context

The Operational Requirements process does not sit in isolation. It follows on from a risk assessment process and leads to application of effective and proportionate protective security measures.

To develop a prioritised list of security risks, organisations will need to conduct a risk assessment using threat information and an understanding of their operating context and their vulnerabilities. Whilst most organisations will have their own risk assessment processes spanning a variety of the business risk areas, it is essential that security risks are adequately considered. Advice on security risk assessments is available on the NPSA website under Principles of Risk Assessment.

The OR process uses this prioritised list of security risks to develop effective protective security measures.

Operational Requirements Process

The following sections describe the OR process which will lead to a set of protective security measures assessed by the likelihood of successful application.

There are six recommended steps in the OR process, completed over two templates:

1) Splitting up a site (defining the geographical areas for consideration)
2) Defining the risks and mapping to the areas under consideration
3) Identifying and developing a suite of protective security recommendations to address the
4) risks
5) Assessment of protective security recommendations (in terms of likelihood of success)
6) Mapping back to risks (have the risks been mitigated by the measures? Is the residual risk
7) acceptable?)
8) Implementation of security measures (and next steps)

It is important to record as much detail as possible during the process and the use of the NPSA templates (illustrated below) will help with this. Blank templates are available on the NPSA website for you to use. It is important that an organisation clearly identifies who owns the OR process to ensure outcomes are achieved.

OR TEMPLATE: Site area, risks, recommendations and effectiveness			
Area	**Risk**	**Security Recommendations ***	**Effectiveness (mostly met/ partially met)**
Beyond the Perimeter	1)	*Add lines if required*	
	*Additional lines should be added for additional risks***	*Add lines if required*	
		Add lines if required	
		Add lines if required	
Perimeter	1)		
	Additional lines should be added for additional risks		
Within the site	1)		
	Additional lines should be added for additional risks		
Building	1)		
	Additional lines should be added for additional risks		
Asset	1)		
	Additional lines should be added for additional risks		

SECURITY RECOMMENDATIONS TEMPLATE

Use the CPNI INTERACTIVE DIAGRAM to help you identify proportional mitigations that cover physical and personnel security. Use the NCSC website for Cyber security measures. Use the NaCTSO Crowded places guidance for additional information specific to public areas

Security Layer/ Principle	Beyond the perimeter	ASSESS (RAG)	Perimeter	ASSESS (RAG)	Within the site	ASSESS (RAG)	Building	ASSESS (RAG)	Asset	ASSESS (RAG)
Deter -*stop or displace the attack*										
	Add additional lines as required									
Detect -*verify an attack, initiate the response*										
	Add additional lines as required									
Respond - *apprehend the attack and prevent further progress of the attack*										
	Add additional lines as required									
Delay - *prevent the attack from reaching the asset*										
	Add additional lines as required									
Mitigate - *minimise the consequences of an attack*										
	Add additional lines as required									

Whilst the OR process can be followed by an individual, it can be far more efficient and effective to use a stakeholder workshop(s) as a key part of the process. This will encourage buy-in from stakeholders and allow a wider range of ideas to be identified and considered. A well-structured and facilitated workshop is highly likely to provide a robust OR, in turn leading to a better protective security outcome. NPSA suggests the following personnel are considered as workshop attendees:

- Security Manager
- Security Team
- Head of Guard Force
- Human Resources
- Counter-Terrorism Security Adviser
- Facilities Manager
- Operations Manager
- Customer Relations Manager
- Union Representative
- Budget Holder
- Communications Manager
- Health and Safety Manager/Representative
- Director / Head of security/ safety / resilience / corporate risk
- Other external stakeholders – e.g. regulator, local council planning / licensing team
- For major refurbishments or new builds, representatives from the project team

Using the templates

Step 1: Splitting a Site Up

Where a site is large or complex, it can be helpful to consider different areas and/or aspects of the site in turn to allow a sufficiently detailed analysis of security requirements.

Our recommended approach – as described on the NPSA website – is to consider the five generic areas typical of many sites:

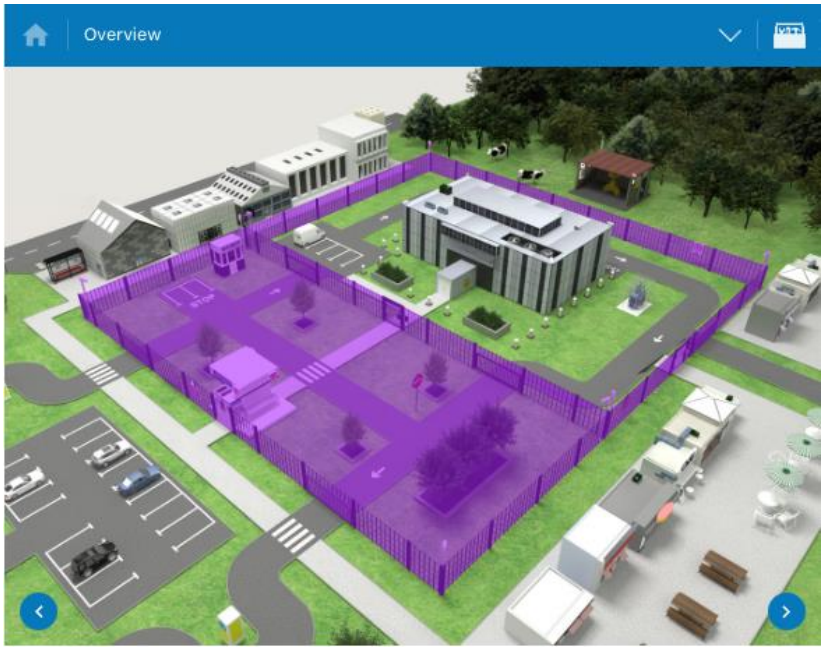
- Beyond the Perimeter
- Perimeter
- Within the Site
- Building
- Asset

However, for some sites it may be more appropriate to modify the area or description of an area to better fit the site being considered. For example, where there is public access to a building the perimeter may be the internal boundary between public and staff only areas. This description will need to be recorded on the template and communicated within the workshop to ensure that everyone has a clear definition of the areas under consideration.

Step 2: Defining the Risks

The next stage in the process is to identify, review and agree the risks for each of the areas an organisation is going to consider. If an existing risk assessment process or risk log is present then these risks should be mapped across to your site areas. It is important that any risks are defined with enough granularity to be able to identify recommendations.

This stage of the process should result in a list of the risks under the five areas, some of which will apply to multiple areas and will therefore appear more than once. Where a site has an extensive risk log it may be more manageable to consider the highest priority risks first.



Step 3: Developing Protective Security Recommendations

The NPSA website has an interactive diagram which is based on the five geographical areas mentioned in Step 1. For each area there is a 'Principles' tab at the bottom of the diagram which contains a definition of the area along with the high level security principles which are set out using the following considerations:

- Deter – stop or displace the attack
- Detect – verify an attack, initiate the response
- Delay – prevent the attack from reaching the asset
- Respond – apprehend the attack and prevent further progress of the attack
- Mitigate – minimise the consequences of an attack

These principles should be used to direct the thinking around potential security measures and are available, in more detail, on the 'Principles' tab within the interactive diagram. Consider each of the identified risks in terms of a security discipline (physical, personnel, cyber and technical) and then consider how that discipline can contribute to each of the considerations above. This will build up a range of security measures which have been carefully thought through.

As the measures are systematically assessed they should be entered on the recommendations table to confirm they are balanced across the five areas and five criteria.

Step 4: Assessment of Protective Security Measures

The next step is to prioritise these protective security measures (which may include those in place, modifications to existing measures and new measures) in terms of their likelihood of successful application. Each of the measures identified should be considered against the following criteria:

- **Resources** required (capital/operational expenditure, staffing, facilities);
- **Operational Readiness** (the ability/willingness to implement) of the organisation to implement the measure; and
- **Stakeholder Engagement** and support in making the measure work.

Resources	None (1)	Limited availability (2)	Readily available (3)
Organisational Readiness	None (1)	Limited capability (2)	Good capability (3)
Stakeholder Engagement	None (1)	Limited engagement (2)	Good engagement (3)

The scores for resources, organisational readiness and stakeholder engagement for each recommendation should be totalled together and the final score assessed using the bands below:

Green	8 or 9	Recommendations can be applied.
Amber	5 to 7	There will be some barriers to overcome.
Red	3 or 4	There are significant barriers to overcome.

Alternative scoring systems such as selecting the lowest score in any of the three categories could also be used. This scoring can then be used to order the list of recommendations with the one most likely to succeed at the top. In all cases this assessed list will provide the relative order of importance of the measures for that organisation, rather than a list which can be compared between organisations.

Step 5: Mapping Back to Risk

The next step in the process is to map the recommendations back to the OR Template. The recommended measures agreed upon should be entered into the 'recommendations' column. This allows an organisation to identify which risks are not mitigated or where there are limited recommendations. Where the recommendations are not deemed sufficient an organisation has to decide whether to accept and record the risk on the risk register or if further recommendation is required.

The final column in the table should be used to assess the likely effectiveness of each measure and they should be assessed as either:

- Mostly met; or
- Partially met

Whilst the assessment of effectiveness is likely to be subjective, where measure(s) are assessed as 'partially met' the residual risk should be updated/recorded on the security and/or corporate risk registers.

Step 6: Implementation of Security Measures

At the final stage in the process you will now have a set of protective security recommendations mapped out against the five geographical areas; these measures have been agreed as holistic covering all the necessary criteria. The protective security measures will have been mapped back to the risk and the organisation will be confident the risks have been mitigated or recorded on the risk register.

The guidance material provided by NPSA can be accessed using the interactive diagram on the NPSA website. The website is structured to enable you to move from introductory pages through to specific advice and then on to detailed technical documents. Users will need to decide the appropriate level for their use and some users will engage the services of a security professional to implement the more technical aspects (commissioning/design and build).

Where protective measures identified require cyber advice, this can be found on the National Cyber Security Centre website and technical security guidance can be found on the National Authority for Counter Eavesdropping website.

Crowded places protective security advice can be found on the National Counter Terrorism Security Office website.

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