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Document: 8.4.17 Applicant's Comments on Post-Hearing
Submissions and Interested Party Action Points

Final Issue A

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1. About this Document

1.1 Introduction

- 1.1.1 This document relates to hearing action points and post-hearing summaries of oral case following hearings held between 22 June 2026 through 26 June 2026. These were Open Floor Hearing 4 (OFH4), Compulsory Acquisition Hearing 3 (CAH3), Issue Specific Hearing 3 (ISH3) and Issue Specific Hearing 4 (ISH4).
- 1.1.2 The Applicant submitted its post-hearing summaries of oral case at Deadline 6 (7 July 2026) and also provided a response to hearing action points arising from those hearings. These were provided in the following documents:
- **8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [REP6-116]**
 - **8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]**
 - **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**
 - **8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119]**
- 1.1.3 In some instances, the Applicant committed at Deadline 6, within the above documents, to providing a further update or response to hearing action points at Deadline 7.
- 1.1.4 At Deadline 6, Interested Parties (IPs) and Affected Parties (APs) also submitted their post-hearing summaries of oral case, and responded to any hearing action points as relevant.
- 1.1.5 This document therefore provides:
- an update from the Applicant on any hearing action points that were committed to for Deadline 6;
 - the Applicant's comments on any submissions made by IPs or APs in their response to hearing action points; and
 - the Applicant's comments on the summaries of oral case submitted by IPs or APs in respect of OFH4, CAH3, ISH3 and ISH4.
- 1.1.6 In addition, the Applicant identified that a number of submissions at Deadline 6 commented on Action Point 27 from Issue Specific Hearing 2 (ISH2) held on 28 April 2026. The Applicant has grouped these submissions, some of which are extracts from larger submissions, in order to respond in an efficient and proportionate manner. This is provided in Appendix A of this document.
- 1.1.7 The Applicant notes that some summaries of oral case were made by IPs or APs who did not speak at the hearing on the day. These are included in this document where clearly identified within the submission as relating to the hearing. Other written submissions by IPs or APs that did not identify a specific relation to the hearings are

responded to in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6.**

1.2 Structure of this Report

1.2.1 The document is ordered as follows:

- Section 2: Applicant's Update on our Response to Previous Action Points
- Section 3: Comments on Interested Parties' Responses to Hearing Action Points
- Section 4: Comments on Summaries of Oral Case from CAH3
- Section 5: Comments on Summaries of Oral Case from ISH3
- Section 6: Comments on Summaries of Oral Case from ISH4
- Section 7: Comments on Summaries of Oral Case from OFH4
- Appendix A: Applicant's Response to Comments on ISH2 Action Point 27

2. Applicant’s Update on our Response to Previous Action Points

2.1 Overview

2.1.1 The table below provide the Applicant’s update to its action points deferred from **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**, where the Applicant committed to providing further information at Deadline 7.

2.2 Applicant’s update to its ISH4 Action Points

Table 2.1 Applicant's update to ISH4 action points

ISH4 Action Point	Applicant Response at Deadline 6 [REP6-118]	Applicant Update at Deadline 7
Action Point 6 <i>Provide further comments regarding limiting movement of pylons closer to Hines Close Aldham.</i>	The Project design has sought to minimise effects on Aldham. A visualisation illustrating the LoD was provided from Viewpoint 4.37: Hines Close, Aldham from on page 16 in 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] . As noted under Item 5.3a the Applicant has concluded that there would be no change to the conclusions of the Sensitivity Testing undertaken in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] .REP6-166	The ExA has expressly requested that the Applicant consider a restriction on the LoD at Aldham, and the Applicant has given this further consideration. The Applicant considers that there is a unique set of circumstances at Aldham which justifies a restriction on the LoD at pylons TB54 and TB55. These circumstances are that Aldham has the highest concentration of properties within 200 m of the Project, compared with anywhere along the route, and the garden boundary of the closest property is within approximately 70 m of the Project centreline, and within approximately 100 m of the nearest pylon. In addition to this, the streets within the eastern part of the settlement (Hines Close, The Chase and Church Grove) are orientated east / west, which means that a north/south longitudinal movement of the pylons from their current positions could bring them into close views looking east along these streets. The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] identified that there would be an increase in the magnitude of change from Viewpoint 4.37 (Hines Close, Aldham) should there be a change in the LoD in this location, albeit that visual effects would be significant for both options. Following the request made by the ExA the Applicant has made a commitment to restrict the movement of the following pylons to the rear of Hines Close in Aldham and has included the following description in Commitment GG34 of the 7.2 Outline Code of Construction Practice [Revision G] submitted at Deadline 7: TB54 – maintain its position as far as practicable to minimise visual effects on the community of Aldham. The Applicant will endeavour to limit lateral movement to the west to 10 m or less. Where this is not practicable, lateral movement shall be limited to a maximum of 30 m. Restrict longitudinal movement to the south to no greater than 50 m and restrict any increase in pylon height as far as practicable. TB55 – maintain its position as far as practicable to minimise visual effects on the community of Aldham. The Applicant will endeavour to limit lateral movement to the west to 10 m or less. Where this is not practicable, lateral movement shall be limited to a maximum of 30 m. Restrict longitudinal movement to the north to no greater than 10 m and restrict any increase in pylon height as far as practicable.
Action Point 7 <i>Suffolk CC to provide to the Applicant as soon as possible a</i>	In response to Action Point 7 the Applicant has asked for an update from Suffolk County Council on when a list of locations that SCC wishes to see included in	The Applicant notes the list was provided by SCC at Deadline 6 in written post-hearing submissions; summaries of and responses to oral submissions made at hearings held during week commencing 22 June 2026 [REP6-166] (see page 29-27).

ISH4 Action Point	Applicant Response at Deadline 6 [REP6-118]	Applicant Update at Deadline 7
<i>list of further sensitive locations it wishes to see included in commitment GG34 of the outline code of construction practice and the Applicant is to respond at Deadline 6.</i>	commitment GG34 of the outline code of construction practice would be available. A response was received from SCC to confirm this will not be issued by Deadline 6.	The Applicant has carried out a further review of the list provided by SCC in Table 1 and 2 (see responses below in Table 3.2). For each location identified, the Applicant provides a technical explanation on why no further restrictions or approvals are required. The Applicants review of the list provided in Table 1 and 2 concludes that the movement within the LoD would not alter the conclusions of the environmental assessments. Therefore, it is considered that there is no reasonable cause to restrict the LoD for these further sites identified in Table 1 and 2. There are circumstances where the Project has made aspirational commitments to restricting the movement of specific pylons through ongoing engagement with landowners and other interested parties. Whilst it may not be necessary to impose LoD restrictions in GG34 which is driven by the ES or change control decision making process there could be in certain circumstances a benefit to capture separately as an aspirational commitment – see Appendix B Additional Detailed Design Requests in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
Action Point 13 <i>Respond to ExA question: In your response to ExQ2 [REP5-211], Appendix E includes a series of drawings illustrating the location and geographical extent of the cumulative landscape and visual effects. These are particularly helpful and the ExA requests that a similar package of drawings is provided for significant (non-cumulative) landscape and visual effects together (by deadline 7).</i>	The Applicant will respond to this by Deadline 7.	The Applicant has provided these drawings at Deadline 7 in 8.5.12.1 Response to ISH4 Action Point 13 [Revision A]. This Action Point is therefore addressed, please refer to that document for the relevant drawings.

3. Comments on Interested Parties’ Responses to Hearing Action Points

3.1 Overview

3.1.1 The tables below provide comments on Interested Parties’ responses to hearing action points across all hearings held 22 to 26 June 2026.

3.2 CAH3 Action Points

3.2.1 No action points to provide comments on.

3.3 ISH3 Action Points

Table 3.1 Comments on Interested Parties’ Responses to Hearing Action Points at ISH3

Hearing Action Point	Interested Parties’ Response to Hearing Action Points at ISH3	Applicant Comments
ISH3 Action Point 2a <i>AP2 Part 5 (Acquisition and Possession of Land) Articles 24 to 46</i> <i>Suffolk CC to provide details of work it has undertaken comparing different approaches across different DCOs in regard to ‘white land’ to the applicant as soon as possible. The applicant is to provide its comments in response (at deadline 6).</i>	Suffolk County Council [REP6-166] On 24 June 2026, SCC provided details of the work it has undertaken comparing differing approaches across different DCOs regarding to the drafting of “Order land”. SCC notes the Applicant will provide its comments in response at D6 and SCC will consider those comments in due course.	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] . Refer to Item 5.1c.
ISH3 Action Point 9 <i>AP9 Schedule 4 (discharge of requirements)</i> <i>As referred to by Suffolk CC, noting its response to the Sea Link DCO (Sea Link examination library reference [REP7-366]), the applicant and all local authorities are to provide a revised draft of Schedule 4 (Discharge of Requirements). This must include provisions enabling the secretary of state to call in any submissions made to a relevant discharging authority which seek to discharge requirements either in whole or in part. It would assist the examining authority if a collaborative approach could be undertaken by</i>	Suffolk County Council [REP6-166] On reflection, SCC considers the provision which enables the Secretary of State to call in any submission made to a discharging authority which seeks to discharge a requirement should be included in an article, rather than in a Schedule to the draft DCO. The main reason for this is that articles provide the main legal provisions for a DCO, while Schedules function as appendices, setting out technical information and procedural matters. In the light of this, it seems to SCC that the proposed provision is more akin to the former, not the latter. It will be remembered that SCC’s proposed drafting based on section 77 (reference of applications to Secretary of State) of the Town and Country Planning Act 1990 which was obviously included in a section of that Act and not in a Schedule to it. Since article 55 sets out the procedure regarding approvals, it would seem sensible if SCC’s proposed new requirement followed it. The proposed drafting is set out below (as coordinated with other Host Local Authorities), followed by SCC’s proposed amendments to Schedule 4 in Appendix A. Regarding SCC’s proposed amendments to Schedule 4 (APPENDIX A), deletions are shown in bold, red and struck-through and additions are shown in bold, black and underlined. Comments in the side bar cross-refer to SCC’s previous examination documents which justified the proposed amendments.	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] . Refer to Items 5.1a and 5.2e. The Applicant’s position is that it is important to allow DESNZ the space to design and establish its Post-Consent Unit without pre-empting its operational framework through prescriptive drafting in the draft DCO on call-in, consultation procedures or similar. The Applicant has set out its response regarding the proposal for a ‘call in’ mechanism in Appendix A of 8.4.12 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] . The Government has accepted Recommendation 30 of the Fingleton Review and committed to establishing the Unit, and deliver post-consent discharge functions in consultation with Local Authority Planning Departments, which will speed up decisions on the meeting of post-consent requirements. DESNZ has shared a road map envisaging stakeholder engagement through to Autumn 2026 and full operation by January 2027. Introducing detailed mechanisms into the draft DCO at this stage risks constraining how the Unit can operate before it even exists, potentially undermining the very efficiency gains it is intended to deliver. Crucially, the Applicant’s proposed drafting already safeguards the role of local authorities: the DESNZ Unit is not made an automatic default, and local planning authorities would

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH3	Applicant Comments
<i>all local authorities with a view to providing a single preferred set of revised wording to Schedule 4 for deadline 6.</i>	Reference of applications to the DESNZ post-consent unit 55A.—(1) Subject to paragraphs (7) and (8), the DESNZ post-consent unit may give directions requiring an application for any consent, agreement or approval required by a Requirement to be referred to them instead of being dealt with by the authority mentioned in that requirement. (2) A direction under this article may relate to a particular Requirement, or to any Requirement. (3) Any application in respect of which a direction under this article has effect must be referred to the DESNZ post-consent unit accordingly. (4) Subject to paragraph (5), where an application to which this paragraph applies is referred to the DESNZ post-consent unit, Schedule 3 (requirements) applies, with any necessary modifications, as it applies where such an application is to be determined by the relevant planning authority or relevant highway authority. (5) Before determining an application to which this article applies the DESNZ post-consent unit must consult – • (a) the relevant planning authority or the relevant highway authority in the Requirement; and • (b) any person named in that Requirement as a consultee¹. (6) Notwithstanding the provisions of this article, the undertaker must provide the relevant planning authority with the written notice mentioned in Requirement 3 (stages of the authorised development) in accordance with the provisions of that Requirement. 7) The power of the DESNZ post-consent unit under this paragraph cannot first be exercised until they have served notice on the relevant planning authority and the relevant highway authority confirming – • (a) they have been established by the Secretary of State; • (b) they are capable of determining an application to which this paragraph applies; and • (c) the date from which they are so capable. (8) In this paragraph, “DESNZ post-consent unit” means a unit established within the Department for Energy Security and Net Zero by or on behalf of the Secretary of State for the purpose of determining any application for consent, agreement or approval required by a Requirement contained in a development consent order. Thurrock Council [REP6-170] Thurrock Council supports the position set out by Suffolk County Council regarding the proposed amendments to Schedule 4 (Discharge of Requirements). The Council supports an approach whereby the relevant local authority remains the default discharging authority, with provision for the Secretary of State/DESNZ Unit to recover or call in individual applications for the discharge of requirements where considered appropriate. This would retain the benefits of local knowledge and accountability whilst providing flexibility for national oversight where required. The Council does not support a mechanism that would allow the Applicant to determine, on a case-by case basis, which authority should determine an application for the discharge of requirements. Instead, the Council supports the collaborative position advanced by Suffolk County Council and other local authorities seeking a clear, consistent, and proportionate framework for the discharge of requirements.	be consulted whenever the Unit acts as the responsible body, therefore preserving local expertise and community accountability in the discharge process. Planning Performance Agreements would also remain to support both future approvals and any consultation arising from DESNZ's involvement. The Applicant therefore considers that the most appropriate course is to retain the flexible framework it submitted at Deadline 5 (8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]) and its further response at Deadline 6 (8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]), which enables the Order to adopt whatever structure the Government directs while ensuring that local authority input remains embedded in the consultation process.

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH3	Applicant Comments
	The Council would also reiterate its points made in its responses to ExQ1 [REP3-088] on Schedule 4: “The Council supports a consolidated approach to post-consent processes, working collaboratively with DESNZ and the Applicant, while retaining its role as a statutory local planning authority.” Braintree District Council [REP6-139] The Council supports the position set out by Suffolk County Council regarding the proposed amendments to Schedule 4 (Discharge of Requirements). The Council agrees that, whilst provision should be made for the future involvement of the proposed DESNZ Requirement Discharge Unit, the current lack of detail regarding its operation, governance and decision-making processes means that it would be premature to transfer discharge functions away from local authorities as the default position. The Council therefore supports an approach whereby the relevant local authority remains the default discharging authority, with provision for the Secretary of State/DESNZ Unit to recover or call in individual applications for the discharge of requirements where considered appropriate. This would retain the benefits of local knowledge and accountability whilst providing flexibility for national oversight where required. The Council has had sight of Suffolk County Council’s proposed DCO wording to be included and is satisfied with their approach. The Council does not support a mechanism that would allow the Applicant to determine, on a case-by-case basis, which authority should determine an application for the discharge of requirements. Tendring District Council [REP6-168] TDC, in consultation with all local authorities is comfortable with the additional wording proposed in the Sealink DCO examination regarding call-in by DESNZ as set out below: 1A.—(1) Subject to sub-paragraphs (7) and (8), the DESNZ unit may give directions requiring an application for any consent, agreement or approval required by a Requirement to be referred to them instead of being dealt with by the authority mentioned in that requirement. (2) A direction under this article may relate to a particular Requirement, or to any Requirement. (3) Any application in respect of which a direction under this article has effect must be referred to the DESNZ unit accordingly. (4) Subject to sub-paragraph (5), where an application to which this paragraph applies is referred to the DESNZ unit, Schedule 3 (requirements) applies, with any necessary modifications, as it applies where such an application is to be determined by the relevant planning authority or discharging authority. (5) Before determining an application to which this paragraph applies the DESNZ unit must consult – (a) the relevant planning authority, relevant highway authority or other discharging authority mentioned in the Requirement; and (b) any person named in that Requirement as a consultee. (6) Notwithstanding the provisions of this paragraph, the undertaker must provide the relevant planning authority with the written notice mentioned in Requirement 4 (stages of the authorised development) in accordance with the provisions of that Requirement.	

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH3	Applicant Comments
	(7) The power of the DESNZ unit under this paragraph cannot first be exercised until they have served notice on the relevant planning authority, the relevant highway authority and other discharging authority confirming – (a) they have been established by the Secretary of State; (b) they are capable of determining an application to which this paragraph applies; and (c) the date from which they are so capable. (8) In this paragraph, “DESNZ unit” means a unit established within the Department for Energy Security and Net Zero by or on behalf of the Secretary of State for the purpose of determining any application for consent, agreement or approval required by a Requirement contained in a development consent order. Essex County Council [REP6-147] ECC supports the position set out by Suffolk County Council regarding the proposed amendments to Schedule 4 (Discharge of Requirements). ECC agrees that whilst provision should be made for the future involvement of the proposed DESNZ Requirement Discharge Unit, the current lack of detail regarding its operation, governance and decision-making processes means that it would be premature to transfer discharge functions away from local authorities as the default position. ECC therefore supports an approach whereby the relevant local authority remains the default discharging authority, with provision for the Secretary of State/DESNZ Unit to recover or call in individual applications for the discharge of requirements where considered appropriate. This would retain the benefits of local knowledge and accountability whilst providing flexibility for national oversight where required. ECC does not support a mechanism that would allow the Applicant to determine, on a case-by-case basis, which authority should determine an application for the discharge of requirements. Instead, the Council supports the collaborative position advanced by Suffolk County Council and other local authorities seeking a clear, consistent and proportionate framework for the discharge of requirements. The approach proposed in the Sea Link DCO examination involved inserted a new paragraph (1A) for inclusion in Schedule 4 (discharge of requirements) to the draft DCO, which is based on the drafting of section 77 of the TCPA – 1A. —(1) Subject to sub-paragraphs (7) and (8), the DESNZ unit may give directions requiring an application for any consent, agreement or approval required by a Requirement to be referred to them instead of being dealt with by the authority mentioned in that requirement. (2) A direction under this article may relate to a particular Requirement, or to any Requirement. (3) Any application in respect of which a direction under this article has effect must be referred to the DESNZ unit accordingly. (4) Subject to sub-paragraph (5), where an application to which this paragraph applies is referred to the DESNZ unit, Schedule 3 (requirements) applies, with any necessary modifications, as it applies where such an application is to be determined by the relevant planning authority or discharging authority. (5) Before determining an application to which this paragraph applies the DESNZ unit must consult –	

Hearing Action Point	Interested Parties’ Response to Hearing Action Points at ISH3	Applicant Comments
	(a) the relevant planning authority, relevant highway authority or other discharging authority mentioned in the Requirement; and (b) any person named in that Requirement as a consultee. (6) Notwithstanding the provisions of this paragraph, the undertaker must provide the relevant planning authority with the written notice mentioned in Requirement 4 (stages of the authorised development) in accordance with the provisions of that Requirement. (7) The power of the DESNZ unit under this paragraph cannot first be exercised until they have served notice on the relevant planning authority, the relevant highway authority and other discharging authority confirming – (a) they have been established by the Secretary of State; (b) they are capable of determining an application to which this paragraph applies; and (c) the date from which they are so capable. (8) In this paragraph, “DESNZ unit” means a unit established within the Department for Energy Security and Net Zero by or on behalf of the Secretary of State for the purpose of determining any application for consent, agreement or approval required by a Requirement contained in a development consent order. ECC would support the inclusion of this wording. South Norfolk District Council [REP6-164] SNDC is content with the wording that has been put forward by Suffolk County Council (see row for SCC response above [REP6-166]) Colchester City Council [REP6-145] SCC, in coordination with the other Host Local Authorities, promotes the drafting as follows (as a revision to Schedule 4) and CCC supports this approach (see row for SCC response above [REP6-166]). Norfolk County Council [REP6-15] NCC has discussed the approach to Schedule 4 with SCC and we are content that their proposed approach is the clearest way forward. We agree with them that the ‘call-in’ provision should be included as a new article in the DCO and we agree with the wording proposed by SCC.	
ISH3 Action Point Requirement 7 (construction hours) • further to ExQ2 DCO 2.S10, provide a clearer explanation of real-life impact of removing: a) just sundays b) bank and other public holidays c) sundays and bank and other public holidays from the construction hours sought in terms of its impact on the energisation date, as set out in	Braintree District Council [REP6-139] The Council wishes to comment on the Applicant's post-hearing submission responding to the ExA's questions and action points relating to construction hours. The Council notes and supports the concerns raised by the ExA in the hearings and, in particular, Action Point 7. The Council will review the Applicant's Deadline 6 submission and reserves the right to provide further comments should this be necessary. Essex County Council [REP6-147] ECC supports the ExA’s concerns raised during ISH3 in respect of the acceptability of the currently proposed construction hours. ECC maintains its position that the proposed construction hours are overly extensive and do not provide sufficient respite for local residents, communities and any other sensitive receptors, particularly in relation to weekend and extended working. ECC’s	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]. Refer to Items 5.2b and Annex A. It is noted that that the Council may respond at Deadline 7 and the Applicant will review such comments once received. The Applicant acknowledges the position of ECC and refers to its comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]. Refer to Items 5.2b and Annex A.

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH3	Applicant Comments
<i>the baseline construction programme</i> • <i>provide an explanation of what impact such restrictions on the applicant's proposed working hours would have in terms of the delivery of the proposed development, over the entire construction period, based on the specialist nature of the project, including in relation shift patterns and the use of specialist contractors</i>	position is explained in more detail in response to ExQ2 DCO2.S10 [REP5-242] and in paragraphs 5.7.18-5.7.21 of the Council's LIR [REP1-161]. Moreover, ECC considers the benefit to residents and local communities from this respite outweighs any harm to the delivery of the project arising from a 9.5 week delay identified by the Applicant during ISH3 should Sundays and all Bank Holidays be excluded from permitted construction hours. ECC would also highlight that the wording of Requirement 7 does not preclude a request from the Applicant for additional working hours should circumstances necessitate such a request .	

3.4 ISH4 Action Points

Table 3.2 Comments on Interested Parties' Responses to Hearing Action Points at ISH4

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH4	Applicant Comments
<i>ISH4 Action Point 1</i> <i>Provide an update on the progress of the draft section 106 agreement regarding landscape enhancement (a response is sought from both the applicant and all local authorities).</i>	Suffolk County Council [REP6-166] SCC, in coordination with all other Host Local Authorities, sent a multi-party section 106 legal agreement for the Applicant to consider on 18 June 2026. Discussions regarding opportunities, associated funds, and delivery mechanisms have continued since. On 7 July 2026, the Applicant has provided the Local Authorities with a draft Article to the DCO. The Local Authorities continue to review the detail contained within the draft Article, however, SCC confirms that this approach (an Article to the DCO) would be an agreeable mechanism to secure the commitment and obligations, should the Secretary of State consider it necessary as per the Council's answer to ExQ2 GEN2.2 [REP5-271]. Thurrock Council [REP6-170] Thurrock Council, together with the other local authorities, remain in discussion with the Applicant regarding the completion of a Section 106 unilateral undertaking to deliver additional landscape planting and enhancement. The Applicant has identified Tilbury North, within Thurrock and in the vicinity of the proposed Tilbury North substation, as a potential off-site Biodiversity Net Gain (BNG) area. However, the Council is concerned by the Applicant's position on landscape enhancement and compensation, which was confirmed at ISH 4, that no agreement will be entered into unless it is deemed strictly necessary. The Council considers that landscape compensation measures are required to mitigate the residual landscape and visual effects of the project and to offset the resulting harm experienced by the public. The Council will continue to engage constructively with the Applicant and the other host authorities with the aim of securing a Section 106 agreement that delivers appropriate landscape enhancement and compensation measures.	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], refer to Item 5.1c. Since Deadline 6, without prejudice to the Applicant's position set out in Item 5.1a, the Applicant has continued to proactively engage with the relevant Local Planning Authorities. The draft Article wording provided in response to Action Point 2 of ISH4 was shared with the relevant Local Planning Authorities for their comment prior to the submission at Deadline 6. The Article is considered to provide an efficient mechanism to secure a financial contribution for the provision of compensatory measures to be delivered by specific lead Local Planning Authorities. Meetings have been held with the councils leading on the compensation discussions (Norfolk, Suffolk and Essex County Councils, Thurrock Council and Babergh and Mid Suffolk District Councils) to discuss the approach further, negotiate the details and seek feedback on the draft wording. The Applicant has welcomed the engagement undertaken to date which has led to the draft Article being updated and included in 3.1 Draft DCO [Revision G] for Deadline 7. It is the Applicant's view that the Article drafting has largely been agreed as all comments received have been addressed where possible. In response to SCC, the Applicant welcomes the comments from SCC, and the positive engagement had to date. In response to Thurrock Council, whilst the Applicant's position on the requirement for the compensation remains unchanged, this has not affected the constructive engagement and negotiations held to date with the Council. The Applicant has had two productive meetings with Thurrock Council ahead of Deadline 7 to discuss and agree matters in relation to the Article. The Applicant notes that Braintree District Council, Tendring District Council and Colchester City Council defer to Essex County Council (ECC) to lead on this matter on their behalf. A response to ECC's comments has been provided below.

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH4	Applicant Comments
	Braintree District Council [REP6-139] In this case, the Council defers to Essex County Council's (ECC) response regarding progress on the landscape enhancement elements (landscape compensation) of the draft Section 106 Agreement, as ECC is leading negotiations on behalf of the Essex authorities in this area. The Council remains engaged in ongoing discussions regarding other legal agreement matters relevant to the District, including replacement tree planting and Biodiversity Net Gain provisions.	The Applicant notes South Norfolk District Council's comments and can confirm that new requirement wording to address offsite BNG and offsite tree planting was provided in 3.1 Draft DCO [Revision G].
	Tendring District Council [REP6-168] TDC Defer to ECC's response to this point, ECC is leading on s106 matters on behalf of TDC.	
	South Norfolk District Council [REP6-164] Following a meeting on 7th July 2026 with National Grid, SNDC was advised that the applicant will be amending the Draft DCO to include a requirement for BNG and an Article for Replacement Tree Planting.	
	Colchester City Council [REP6-145] ECC are leading on this matter/section 106 agreement. This is still under discussion and NGET and the host LPAs met on the 7/7/2027. In short, the LPAs favour a bilateral agreement, but NGET were proposing Unilateral Undertakings. At the meeting it was held that that is no longer the case and now NGET are proposing to deal with the matters by requirement/articles. CCC will comment on this once they have seen the requirement/article submission, wording and justification.	
	Essex County Council [REP6-147] ECC together with other Authorities, remains in discussion with the Applicant regarding the completion of a S106 unilateral undertaking to deliver additional landscape planting focused on the specified landscapes identified by the ExA during ISH2. ECC's approach has been to draw upon the Local Nature Recovery Strategy (LNRS) and focus on land within its control to facilitate delivery of landscape enhancement rather than relying on the cooperation or agreement with third party owners but is working with the Applicant to ensure the structure of any agreement meets the overall objectives while retaining some flexibility to deliver these sites alongside those covered by the masterplan where they do not precisely overlap. Notwithstanding the positive discussions to date, ECC was concerned to hear the position taken by the Applicant at ISH4, and their opinion that no agreement will be entered into unless absolutely required by the Secretary of State. For reasons set out in ECC's response to ExQ2 LV 2.16 [REP5-242] and in its LIR [REP1-161], ECC does not agree with this approach. ECC accepts the presence of the projects overhead powerlines cannot be fully mitigated, and that there will be a residual impact; the acceptability of which will fall to be weighed in the overall planning balance against the public benefits of the project. However, the acceptance of significant residual effects based on public benefit does not negate the effect in itself. As highlighted by ECC's Counsel at ISH4, while it was acknowledged that paragraph 4.2.25 of the 2025 version of EN-1 (which is a material consideration) states that "compensation, by definition, does not reduce an adverse effect resulting from a development", it [NPS-EN1] does go on to confirm that "applicants should set out	The Applicant has welcomed the positive engagement with ECC to date. Whilst the Applicant's position on the requirement for the compensation remains unchanged, this has not affected the constructive engagement and negotiations held to date with the Council. Nor has the Applicant's position affected the delivery of a mechanism through an Article in 3.1 Draft DCO [Revision G] (provided on a 'blue pencil' basis) to secure the compensatory measures. The Applicant notes that ECC had limited time to review the material highlighted in their response prior to Deadline 6 but has met ECC since to discuss matters and has continued to engage as appropriate. The Applicant received feedback from ECC on the Article drafting and updated the wording and included this within 3.1 Draft DCO [Revision G] at Deadline 7 to address the comments raised.

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	how residual impacts will be compensated for as far as possible". ECC is of the opinion there is no significant shift from the position under the 2024 version of EN-1. ECC believes a case exists for a strategic landscape compensation package to offset harm as far as possible in line with the mitigation hierarchy consistent with NPS-EN1 and respectively requests that the case for additional landscape enhancement is made within the ExA's Recommendation Report to the Secretary of State. ECC feels very strongly that this landscape compensation package could deliver significant landscape benefits and leave a positive legacy from the project minimising the residual visual effects of the development as far as reasonably possible. Ahead of a meeting between the Applicant and ECC officers at 9am on 7 July 2026, ECC was provided at 7:09am on the day of the meeting with a draft DCO provision for securing the landscape compensation package instead of entering into a unilateral undertaking. ECC has not had the opportunity to review and will respond accordingly. Furthermore, ECC officers attended a meeting at 12pm on 7 July 2026 with the Applicant, when an announcement was made that they were now proposing to use Requirements within the DCO to secure and deliver the BNG and the tree replacement through the offsite planting delivery scheme. Once these have been made available, ECC will review and respond accordingly.	
	Norfolk County Council [REP6-158] NCC understands that in response to action point two, the applicant is intending to submit (on a without prejudice basis) the draft text for a requirement which would secure landscape compensation. NCC is content with the legal form of a requirement as opposed to a § 106 agreement. The outstanding matters for agreement with the applicant are the precise geographical scope of compensation measures in the Waveney Valley, the appropriate amount of funding to be secured. NCC would be content for the landscape compensation in these general terms to be secured as either a requirement or a § 106	The Applicant notes NCC's comments and has welcomed the positive engagement had with the Council. The Applicant provided draft Article wording to NCC on the day of Deadline 6 for review and has been engaging with the Council on the details of the Article, to include an updated draft within 3.1 Draft DCO [Revision G]. It is the Applicant's view that the Article drafting has largely been agreed.
<i>ISH4 Action Point 2</i> <i>AP2 Landscape and Visual Effects (mitigation and compensation)</i> <i>Provide a draft requirement (agreed where possible with all local authorities) relating to submission of a scheme for landscape enhancement in the event that a completed (signed and dated) legal agreement is not submitted before the end of the examination.</i>	Suffolk County Council [REP6-166] As mentioned in response to AP1, the Applicant has provided the Local Authorities with a draft Article to the DCO. The Local Authorities continue to review the detail contained. SCC considers that agreement amongst the parties is achievable, prior to the close of Examination.	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 [REP5-118]. Refer to Item 5.1d. The Applicant has welcomed SCC's comments on the draft Article wording and addressed the feedback received within the revised wording submitted at Deadline 7 in 3.1 Draft DCO [Revision G]. The updated wording has also been shared with the relevant Local Authorities
<i>ISH4 Action Point 7</i> <i>Suffolk CC to provide to the applicant as soon as possible a list of further sensitive locations it wishes to see included in commitment GG34 of the outline</i>	Suffolk County Council [REP6-166] The additional visualisations that were provided at Deadline 5 [REP5-194 to REP5-198] clearly demonstrate that the LoD as proposed by the Applicant are too liberal, with potential detrimental effects, which could result in greater adverse effects than the submission documents suggest (despite falling into the same assessment category of severity). SCC considers that in no location is it acceptable to increase	As stated in the Applicant's 8.5.3 Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 [REP1-139], the vertical Limits of Deviation (LoD) would not exceed 6 m upwards to allow for variation in pylon positions whilst maintaining electrical clearance requirements. The 6 m vertical LoD allows for two standard pylon extensions to be added, which is not possible with a 4 m vertical LoD. This is due to lattice pylon extensions typically increasing by increments of 3 m. A 6 m vertical LoD was sought and consented on the National

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<i>code of construction practice and the applicant is to respond at deadline 6.</i>	the tower height by 6m without full justification and without approval by the relevant local authority. As stated in the LIR (paragraph 13.18) [REP1-178], SCC and BMSDC request that the pylon positions in key locations will be as shown on consented plans, unless otherwise agreed with the relevant planning authority and, where applicable, Historic England. This applies in particular to pylon towers crossing the Waveney Valley, at Wortham Ling, around Mellis Common, north of Gislingham, at Wickham Skeith, through the Gipping Valley and Bramford/Burstall. Any changes and deviation required as part of micro-siting should only be made in agreement with the relevant local planning authority and, where applicable, Historic England. Table 1: SCC identified key sensitive locations, where it considers that any required micro-siting of tower locations will need to be agreed with the relevant local authorities and, where applicable, Historic England. <i>[see individual rows extracted below]</i>	Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicant's position is that the additional 2 m vertical LoD is proportionate to the scale of the Project and, therefore, the extent of any unknowns, the varying landforms and use across the circa 160 km overhead line route, and ongoing design coordination with a range of third-party developments that could lead to minor design changes at detailed design and construction stages. The Applicant does not agree with SCC and BMSDC that any required micro-siting of pylon locations will need to be agreed with relevant local authorities and, where applicable, Historic England. Any further approvals would risk delay to delivery, and this would be unacceptable for a Project that qualifies as Critical National Priority (CNP) infrastructure and Clean Power 2030. The route alignment and pylon locations were developed following detailed analysis of technical, engineering and environmental survey work and stakeholder feedback. The ExA should note that Historic England have not requested any restrictions or amendment to LoD or asked to sign off any changes. Following consultation with Historic England the Applicant has included a restriction of the LoD for RG86 and RG87 to prevent physical impact to the non-designated Bush Hall moated site (1013), following the approach taken in other locations, as a way to address their concerns (see GG34, 7.2 Outline Code of Construction Practice [Revision G]). Historic England confirmed in their Deadline 5 submission [REP5-250] that they disagree with the degree of LTSH concluded for the Church of St Remigius and Mellis conservation area, but agree that the harm is at the less than substantial level. During the design development of the route, the Applicant has identified other locations where it is necessary to restrict the LoD and secured those limits to ensure siting of pylons would minimise adverse effects in relation to existing landscape character, vegetation (including ancient woodland), heritage assets and other development. <u>The intended use of LoDs</u> The LoD provides a necessary and proportionate degree of flexibility as to the final alignment of the linear works. LoDs are designed to allow for unknown or unforeseeable issues or localised constraints that may arise during construction which would require a minor adjustment to the overhead line alignment and the pylon positions. For example, if a large solid mass such as a large concrete foundation or void such as a well or shaft (in the ground) can be avoided by moving the position of the pylon, then it may be that the LoD are used. The LoD are set out in Article 5 of 3.1 Draft DCO [Revision G] and as shown on 2.3 Works Plans – Section A to H [APP-017; REP6-014; REP4-015; APP-020; APP-021; REP6-016; REP5-021 & REP6-018]. The lateral LoD for the linear works are typically 50m either side of the centre line of the proposed overhead line, as shown on the Works Plans. However, the proposed lateral LoD are not fixed along the entirety of the overhead lines but deviate depending on constraints that are present along the route. In some locations, the LoD have been reduced to avoid the loss of, or impacts on, trees, such as veteran trees, woodland and other environmentally sensitive receptors. <u>Practical limitations in movement of LoDs</u> Although in theory pylons could be moved anywhere along the line, there are practical restrictions on the movement such as the ground profile and land use, conductor swing and maintaining statutory electrical clearances. It would not be possible to move a pylon by 150m without moving adjacent pylons in the section

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		between the angle pylons which dictate the route alignment and as such have reduced flexibility. The 50m lateral LoD for the linear works includes both the lateral movement of a pylon, but also accommodates the maximum swing of the conductor, therefore a pylon cannot move the full 50m laterally, so a pylon with a maximum span length could only move approximately 30m laterally. This demonstrates the potential for movements is in effect very small laterally and therefore an approval mechanism requiring agreement with the LPA should not be required for such small movements since this would not be proportionate. <u>Control mechanisms in the DCO</u> The operation of the LoDs are already controlled through the DCO under the following sections, briefly summarised: • Article 5 of the 3.1 Draft Development Consent Order [Revision G] - specifies lateral and vertical limits within which the authorised development would be permitted to deviate from the lines and situations shown on the Works Plans. • Article 3 (8) - requires NGET to construct the authorised development (as described in Schedule 1) in accordance with Works Plans, subject to the limits of deviation and the Requirements. • Works Plans - The works plans show the longitudinal lines, including lateral LoD for specific works, including the pylons and OHLs. The tables of parameters at the back of each section of Works Plans sets out the height of the infrastructure including pylon heights and the vertical upwards LoD. The Development Consent Order not only authorises the development within defined limits as described above but is also subject to specified controls: • Requirement 4 - Commitment GG34 in the 7.2 Outline Code of Construction Practice [Revision G] includes commitments made to restrict individual pylon movements for mitigation purposes. <u>ES has robustly assessed the full extent of LoDs</u> The Applicant continues to hold its position that no further approvals are necessary to utilise the LoDs if required because the Environmental Statement has already assessed the full extent of the LoD (against a reasonable worst case) and additional mitigation has been applied where appropriate. The applicant has already assessed the alignment as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134] with ES sensitivity testing on the LoD. The Applicant has reviewed the route alignment of the Project and undertook an assessment of the LoD across the route in order to inform the sensitivity testing set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment (Revision D). This assessment concluded that movement within the LoD, except in the locations identified in commitment GG34 of 7.2 Outline Code of Construction Practice [Revision G] would not alter the conclusions of the assessment and in particular would not result in an increase in harm to heritage assets. Therefore, it is considered there is no reasonable cause to restrict the LoD in other locations other than those already included in commitment GG34. Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] sets out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the

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		potential movement of the Project within the LoDs). Whilst it is recognised that the Project is likely to cause a high magnitude of visual change for a number of residential properties, the assessment found that it would not be so harmful that it would 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 become one of public interest (rather than just an impact upon a private view). Any proposed utilisation of the LoD by the Main Works Contractor would be subject to internal approvals by National Grid pursuant to the contract provisions. Should there be a proposed movement by the Main Works Contractor it would be subject to a formal review against the full control framework secured by the DCO. This includes consideration of compliance with the Order Limits, the LoD, the parameters assessed within the Environmental Statement, and all relevant secured mitigation and requirements. Concluding position to SCC request for further approvals Based on the above, the Applicant continues to hold its position that the request for further approvals on micro-siting would not meet the necessity test for a Requirement to be imposed. Paragraph 15.2 of Advice Note 15: “...<i>Requirements should therefore be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects.</i> The approach adopted by the Project on LoDs is consistent with other National Grid Overhead Line DCOs (Richborough and Yorkshire GREEN) that have been approved and we believe is consistent with many other DCOs.
	RG 81 – RG 89 <i>Waveney Valley</i> As the additional visualisations [REP5-196 and REP5-197] demonstrate any deviation from the alignment shown on the works plans has the potential to exacerbate the adverse effects in this sensitive landscape. SCC therefore considers that ANY deviation from the plans should be agreed with the relevant discharging authorities.	Given the current uncertainty on the specific location of the naturalised River Waveney through the Waveney Valley, as part of the DEFRA/Suffolk Wildlife Trust led Waveney and Little Ouse Recovery Project (WALOR), some design flexibility via the LoD is required in the area. This limited design flexibility for the overhead line, will ensure both projects can be successfully delivered together within the Waveney Valley as committed to within the 7.4 Outline Landscape and Ecological Management Plan [Revision G]. The Environmental Impact Assessment has already assessed all potential impacts within the LoD. The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects within the Waveney Valley as a result of movement of pylons RG81 to RG89 within the LoD, including from Viewpoints 1.14 and 1.22 which are located in proximity to these pylons.
	RG 82 Located in South Norfolk but included for completeness: The lateral LoD as proposed by the Applicant could exacerbate the adverse visual effects on <i>Russet Lodge</i> to the extent of becoming overbearing. Changes along the longitudinal axis could reduce the adverse visual effects, but resulting effects on other receptors would need to be addressed.	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] sets out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). Whilst it is recognised that the Project is likely to cause a high magnitude of visual change for a number of residential properties, the assessment found that it would not be so harmful that it would 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 become one of public interest (rather than just an impact upon a private view). 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

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		Visual Amenity Threshold has been identified to any of the residential properties that have been identified – within the RVAA or its addendum.
	RG 86 Located in South Norfolk but included for completeness: The LoD as proposed by the Applicant could exacerbate the adverse visual effects on the <i>Angles Way</i> to the extent of becoming overbearing [REP5-196 and REP5-197].	GG34 already commits to restricting movement of RG86 to the south to prevent physical impact to non-designated heritage asset Bush Hall (1013). The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects within the Waveney Valley as a result of movement of pylon RG86 within the LoD, including from Viewpoint 1.22 which is located in proximity to this pylon. The restriction of RG86 on heritage grounds would also prevent the pylon moving closer to the Angles Way, which is to the south. Documents 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] sets out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoD). Whilst it is recognised that the Project is likely to cause a high magnitude of visual effect for Russet Lodge, including should such movement of the Project in the LoD occur, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 89 – RG 91 <i>Wortham Ling</i> SCC would not support the towers to be located any closer to Wortham Ling that shown on the works plans. SCC considers any changes should be agreed with the relevant discharging authorities, in particular for RG 89, the longitudinal LoD for RG 90 appears to be less crucial.	Neither the Order Limits nor the overhead line LoD extend into Wortham Line SSSI, with measures taken during the design process to avoid any impacts to this nationally designated site. The minor design variations allowed within the LoD in proximity to Wortham Ling SSSI, have been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C] and pose no new or greater ecological effects on the SSSI or its designating features. No restrictions to the LoD in Waveney Valley are deemed necessary from an ecological perspective. The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects at Wortham Ling as a result of movement of pylons RG89 to RG91 within the LoD, including from Viewpoint 2.01 which is located in proximity to these pylons.
	RG 93, 94 Resulting effects could be considerably worse for the <i>residential property on Lion Road</i> (not the one in the viewpoint), if pylon was moved east and/or south. Effects could also be worse for property shown in VP if tower was moved west. Likewise, effects could be made worse for <i>properties around St Johns House and Cottages</i> and for Goodrich Park. LoD may also affect archaeology.	Moving RG94 within the LoD would not impact any known archaeological remains. Pylon RG93 is located within a parcel of land containing field boundary cropmarks but the mapped cropmarks are located outside the range of movement possible for pylon RG93. There are, therefore, no historic environment constraints for the movement of pylons RG93 to RG94 within the LoD.
	RG 103 – RG 106 <i>North of Mellis Common</i> Here, SCC considers that LoD should be minimised, as it is considered that one of the mitigation measures of the scheme is to use the footprint of the powerline that will be removed. The benefits could be greatly reduced, if the LoD were fully applied. SCC has also asked for additional visualisations with a reduced tower height around	The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects at Mellis as a result of movement of pylons RG103 to RG106 within the LoD, including from Viewpoint 2.05 which is located within Mellis Common. Notwithstanding this, the Applicant has included the following text in the Additional Detailed Design Requests under ADDR-

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	Mellis Common. This was not pursued. SCC would not be able to support an increase in tower height from that shown in the submission documents.	113 submitted at Deadline 7 (See Appendix B of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A]): 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 minimise vegetation loss. The Applicant is therefore willing to record the SCC request at Mellis Common as an aspirational commitment so that this can be further considered during the detailed design stage, subject to technical, socio-economic, environmental and constructability considerations. The residential visual amenity of Lions Farm, Lions Farm Annex and Holly Tree Farm have 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) provided by Deadline 7. This Document 6.13.1.A4 Environmental Statement Appendix 13.4.1 – Addendum to the Residential Visual Amenity Assessment Final Issue A recognises that a parts of the curtilage of these properties lie within 200 m of the permanent above ground elements of the Project. However, as these areas are located 200 m beyond the nearest proposed pylon the effects on them are not considered likely to affect ‘living conditions’ – as defined in the RVAA, and the industry guidance this follows. 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. The residential visual amenity of Goodrich Park has been considered in Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135]. This concluded that the Project would only give rise to a low magnitude of visual effect. Even if movement of the Project in the LoD was to occur, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area with regards to residential visual amenity.
	RG 106, 107 <i>Furze Way</i> Towers are positioned between residential properties, and any lateral movement could potentially result in greater adverse effects for some of the properties. Limited longitudinal changes along the alignment could bring benefits, if aligned more closely with field boundaries, but potential adverse effects would need to be assessed/ therefore agreement with discharging authority would be required	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] sets out an assessment of the Project’s impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). Whilst it is recognised that the Project is likely to cause a high magnitude of visual change for a number of residential properties, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). 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

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		Visual Amenity Threshold has been identified to any of the residential properties that have been identified – within the RVAA or its addendum.
	RG 112 – 116 This is an occasion where SCC would potentially cautiously welcome a lateral deviation to the north-east to avoid the vegetation along the <i>Green Lane</i>. However, adverse effects, such as on Mellis Common would need to be considered and therefore any changes should be fully assessed agreed with the relevant local authority.	The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects south-west of Mellis as a result of movement of pylons RG112 to RG116 within the LoD. Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] (the RVAA) sets out an assessment of the Project's impact on the residential visual amenity of those living in this area (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). The RVAA identified that the proposed pylons closest to Willow Tree Cottage, Church View, South View and Church View Annexe are located in areas where they would be replacing existing pylons in similar geographical locations and which are of a similar scale. The assessment found, therefore, that the change brought about by the Project would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area. With regards to the residential property on the other side of the Project – Windeye, the RVAA considered that the Project would only give rise to a low/medium magnitude of visual effect. Even if movement of the Project in the LoD was to occur, the assessment found that it would not be so harmful that it would breach the Residential Visual Amenity Threshold (RVAT). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 125 – 126/130 Here, SCC would potentially cautiously welcome a slight longitudinal and lateral deviation (bringing RG125 approx. 20-25m further south-west and then realigning to RG130) to avoid the vegetation along PRow and crossing over the PRow twice, thereby reducing the adverse effects. However, other resulting adverse effects, would need to be considered and therefore any changes should be agreed.	The Sensitivity Testing in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] did not identify an increase in the magnitude or significance of landscape or visual effects between Finningham and Wickham Skeith as a result of movement of pylons RG125 to RG130 within the LoD, including from Viewpoint 2.23 which is located in proximity to the Project.
	RG 161 – 163 <i>Hill Farm; Creeting Hall; Gipping Valley</i> Visual amenity could be further compromised by lateral movement, which should be avoided. Longitudinal changes could potentially reduce the adverse effects on Creeting Hall, but resulting adverse effects would need to be fully assessed and agreed with the relevant local authority.	As set out in the Applicant's response to Alt 1.9, on page 118 onwards of 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299] the Environmental Statement [APP-123 to APP-287, AS-026 and AS-068] applies assumptions to assess worst-case scenarios and assesses the LoD within the 'sensitivity testing' section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed, and no reassessment is required should the LoD be used during detailed design. Therefore, neither lateral nor longitudinal movement of pylons RG161 – RG163 within the LoD would be sufficient to decrease or increase the mid less than substantial harm due to change in the setting of the Grade II* listed Creeting Hall (1352073) during the operation (and maintenance) phase of the Project. Likewise, neither lateral nor longitudinal movement of pylons RG161 and RG162 within the LoD would be sufficient to decrease or increase the mid less than substantial harm due to change in the setting of the Grade II listed Hill Farm (1182339) during the operation (and maintenance) phase of the Project.

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		Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] (the RVAA) set out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). The RVAA considered that the Project would only give rise to a medium magnitude of visual effect for the North Wing, South Wing, Hall Barn and Tudor Barn at Creeting Hall. Even if movement of the Project in the LoD was to occur, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 168 – 172 <i>Badley Hall cluster</i> While the proposed alignment is not visible from this location, assurance is sought that this remains the case, should taller towers need to be installed closer to this location. SCC considers that the alignment must not be moved further west and that taller towers must not be used in this location. <i>Great Newton Wood and Lodgefield Row;</i> these woodlands could be impacted by lateral deviation.	The Applicant takes the “Badley Hall cluster” to comprise Badley Hall (1231083), Bakehouse 15 Metres South of Badley Hall (1278291), Barn 100 Metres South East Of Badley Hall (1231085), Dovecote 60 Metres East of Badley Hall (1231084), and the now un-scheduled Chantry (Site of) (formally 1006030). Due to the restricted nature of the dovecot's setting, it was scoped out from further assessment at the scoping stage of the assessment 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] . The settings of the hall, the barn, the bakehouse and the site of the chantry were assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C] where it was concluded that the settings did not extend to the Order Limits, and so the assets were not taken forward for further assessment. The nearest pylon to the “cluster” lies c. 1.1 km to the south-east and even the maximum movement of the pylons within the LoD would be difficult for a viewer to distinguish.
	RG 175 Heritage Asset near <i>Gibbons Farm</i> could be compromised.	As a low value non-designated asset the setting of Gibbon's Farm (2434), based on the methodology set out in 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] , was not assessed. Movement of pylon RG175 towards the asset within the LoD would not result in any physical impact to the asset and therefore would not alter the assessment. However, it is preferential for the pylon not to moved closer to the asset.
	JC 11, 12 <i>Burstall Lane</i> Tower location could potentially be located adjacent to residential property (visual amenity)	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] set out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). Whilst it is recognised that the Project may cause a high magnitude of visual effect for Hill Farm House, should such movement of the Project in the LoD occur, the assessment found that it would not be so harmful that it would 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 become one of public interest (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	Table 2: SCC identified further sensitive locations, with tower-specific proposals for restrictions of LoD. RG 134 – 136 <i>Potter's Lane, Potter's Farm, Wicks Farm;</i>	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] set out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the

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	Visual amenity could be further compromised through LoD.	potential movement of the Project within the LoDs). Whilst it is recognised that the Project is likely to cause a high magnitude of visual effect for Potters Farm and Wicks Farm, including should such movement of the Project in the LoD occur, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 174 <i>Laurel Cottage;</i> Visual amenity could be further compromised.	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] (the RVAA) set out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). The RVAA considered that the Project would only give rise to a low/medium magnitude of visual effect for Laurel Cottage. Even if movement of the Project in the LoD was to occur, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 185 <i>Ringshall House</i> Visual amenity could be further compromised.	The dwelling and curtilage of Ringshall House 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 - Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] . Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 188, 189 <i>Middle Wood</i> SCC would not support deviation to the east, as this could adversely affect the woodland.	Middle Wood Site of Special Scientific Interest (SSSI) and ancient woodland lies outside but adjacent to the Order Limits. While the LoD allows some flexibility in design, the DCO certified documents, including the 7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G] , must also be adhered to. Both documents provide additional commitments that must be followed during the detailed design process, regarding ecological designated sites and ancient woodland. Within 7.2 Outline Code of Construction Practice [Revision G] commitment B17 includes a minimum 15 m exclusion zone from the edge of all ancient woodlands (with the exception of those referenced in the 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D] which have bespoke mitigation measures and commitments). Middle Wood also has its own specific commitment in B33 of the 7.2 Outline Code of Construction Practice [Revision G] to ensure pulling locations and third party works have no impact to the designated site and ancient woodland. No further restrictions to the LoD are deemed to be necessary by the Applicant, with the mechanisms that are in place to ensure no detrimental impact to Middle Wood as a result of the Project.
	RG 192 <i>Court Farm</i> Visual amenity could be further compromised.	Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] (the RVAA) set out an assessment of the Project's impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). The RVAA

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		considered that the Project would only give rise to a low/medium magnitude of visual effect for Court Farm (mistakenly referred to as ‘Lost Farm’, property ID B23 in the RVAA). Even if movement of the Project in the LoD was to occur, the assessment found that it would not be so harmful that it would 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 become one of public interest (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 193 – 194 <i>Hill Farm</i> Visual amenity could be further compromised.	The dwelling and curtilage of Hill Farm lies outside of the 200m offset from the Project Centre Line, as shown on the Woks Plans. Therefore, it has not been included in the Residential Visual Amenity Assessment - Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-135] . Therefore, it is considered that there is no reasonable cause to restrict the LoD in this area.
	RG 197, 200 <i>Blood Hill: The Clamps</i> (potential additional vegetation loss) and <i>Bleak Hall</i> (visual amenity)	The Applicant notes the concerns relating to potential additional vegetation loss as a result of works to third party infrastructure. The Applicant has committed to minimising vegetation removal where possible. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision G] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [Revision G] . Measures to avoid/mitigate impacts to all trees (including veterans) is also Project commitment LV05 in 7.2 Outline Code of Construction Practice [Revision G].Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] to [REP5-135] sets out an assessment of the Project’s impact on the residential visual amenity of those living near to the Project (including an assessment of the worst-case scenarios with regards to the potential movement of the Project within the LoDs). Whilst it is recognised that the Project is likely to cause a high magnitude of visual change for a number of residential properties, the assessment found that it would not be so harmful that it would 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 (rather than just an impact upon a private view). 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.
	RG 201, 202 <i>Somersham Park</i> Ancient woodland could be adversely affected by lateral LoD	Somersham Park ancient woodland lies outside but adjacent to the Order Limits. While the LoD allows some flexibility in design, the DCO certified documents, including the 7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G] , must also be adhered to. These documents provide commitments that must be followed during the detailed design process, with regard to ecological designated sites and ancient woodland. Within 7.2 Outline Code of Construction Practice [Revision G] commitment B17 includes a minimum 15 m exclusion zone from the edge of all ancient woodlands (with the exception of those referenced in the 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D] which have bespoke mitigation measures

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		and commitments). No further restrictions to the LoD are deemed to be necessary by the Applicant, with the mechanisms that are in place to ensure no detrimental impact on Somersham Park as a result of the Project.
	JC 09, 10 <i>Burstall Long Wood</i> Ancient woodland could be affected; bringing the alignment closer to the woodland would not be supported by SCC	Burstall Long Wood ancient woodland lies outside but adjacent to the Order Limits. While the LoD allows some flexibility in design, the DCO certified documents, including the 7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G] , must also be adhered to. Both documents provide commitments that must be followed during the detailed design process, with regard to ecological designated sites and ancient woodland. Within 7.2 Outline Code of Construction Practice [Revision G] commitment B17 includes a minimum 15 m exclusion zone from the edge of all ancient woodlands (with the exception of those referenced in the 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D] which have bespoke mitigation measures and commitments). No further restrictions to the LoD are deemed to be necessary by the Applicant, with the mechanisms that are in place to ensure no detrimental impact to Burstall Long Wood as a result of the Project.
	JC 14, 15, 16 <i>Hurdle Makers Hill (A1071): Guest House, Home Farm,</i> Heritage Asset could be further affected by LoD.	Neither lateral nor longitudinal movement of pylons JC14 – JC16 within the LoD would be sufficient to decrease or increase the lower less than substantial harm through change to the setting of the Grade II listed Fenn Farmhouse (1351617) during the operation (and maintenance) phase of the Project. Pylon JC15 is located within a parcel of land containing field boundary cropmarks but the mapped cropmarks fall outside the Order Limits. There are, therefore, no historic environment constraints for the movement of pylons JC14 to JC16 within the LoD.
<i>ISH4 Action Point 5</i> <i>Villages Against Pylons to submit its consultant's comments regarding the visual and functional linkages between the Colne Valley and the Dedham Vale National Landscape.</i>	Villages Against Pylons [REP6-172] Question 1: Can you please set out the relationship between the Colne Valley and the Dedham Vale. How does the Colne Valley contribute to the setting of the Dedham Vale? The Colne Valley contributes to the setting of the Dedham Vale National Landscape through the way in which the wider river valley landscape is experienced. Although the designated boundary marks the extent of the National Landscape, the change in landscape character on the ground is less definitive. Instead, the river valley continues beyond the designation with a consistent pattern of wooded valley sides, pastoral valley floor, mature hedgerows, historic settlements, ancient woodland and a strong relationship between the river corridor and the surrounding landform. This continuity enables the Colne Valley to function as part of the wider landscape setting of the Dedham Vale. There is also a strong visual relationship between the two landscapes. The elevated plateau and valley sides surrounding the Colne Valley provide extensive views across the wider river valley landscape, allowing appreciation of the continuity of landform, wooded valley sides and historic settlement pattern beyond the National Landscape boundary. Consequently, changes to the character of the adjoining landscape have the potential to influence the appreciation and experience of the Dedham Vale. The significance of this relationship is reflected in the special qualities identified for the Dedham Vale National Landscape. The Natural Beauty and Special Qualities study ¹ (2016) identifies the area's scenic quality, lowland river valley character, relative tranquillity and long-distance views from higher ground as defining special	The Applicant disagrees with the assertion that the Colne Valley contributes to the setting of the Dedham Vale, as set out 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). As explained in Appendix D2 of 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114] there is a change in character within and around the Colne Valley. This is reflected in the descriptions for each of the recognised, published landscape character areas (LCA) illustrated in 6.13.F6 Environmental Statement Figure 13.6 - Landscape Character Types and Landscape Character Areas [Revision C] page 8 of 13. The Stour River Valley (within Dedham Vale National Landscape) and Colne River Valley (outside the National Landscape) are distinctly different, unconnected river valleys as illustrated in 6.13.F2 Environmental Statement Figure 13.2 - Landform and Drainage [APP-238] page 8 of 13. Dedham Vale National Landscape is centred on the wide Stour River Valley Floor and relatively steep and undulating valley sides; whereas the Colne River Valley Floor is narrower and the valley sides are generally smoother and shallower. The Applicant does not judge the visual relationship between the Colne River valley and Dedham Vale National Landscape (Stour Valley) to be strong. This is because these valley landscapes are physically separated by distance and plateau landform. Views from the valleys are typically contained and inward looking. Views of the valleys themselves are typically not appreciated until the viewer is approaching the edge of the adjacent plateau at the top of the valley slopes. The Applicant has responded previously to concerns about the visibility of the Project from Dedham Vale including within the Applicant's comment on responses to LV 1.14

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	qualities. It also identifies electricity pylons as detractors from tranquillity and recognises that development on upper valley slopes, or which interrupts valued views, has the potential to erode these qualities. As discussed within our previously submitted ‘Landscape and Visual Technical Note’, the Applicant's own assessment acknowledges adverse effects on views from the Dedham Vale National Landscape. Whilst we disagree with the Applicant's assessment of the significance of effect, it nevertheless confirms that the proposed development would adversely affect the setting of the National Landscape and would not contribute to the statutory purpose of conserving and enhancing its natural beauty. Taken together, the shared landscape character and visual relationship between the Colne Valley and the Dedham Vale demonstrate that the Colne Valley forms an important component of the wider landscape setting of the National Landscape. Whilst outside the designated boundary, it contributes positively to the appreciation of the Dedham Vale's special qualities. This is consistent with the National Planning Policy Framework, which recognises that development within their setting should be sensitively located and designed to avoid adverse impacts on the designated areas.	in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299], pages 262 to 281. As also explained in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115] (page B6) the fact that the Project will be distantly visible from parts of the Dedham Vale National Landscape is not disputed. The Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant, as set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [Revision B]. In terms of effects, the potential for effects on the Special Qualities of the Dedham Vale National Landscape was considered when siting the CSE compounds and routing of the overhead line. The Applicant has responded to points made in the Landscape and Visual Technical note in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. This includes reference to the Applicant's setting study which considers areas of the landscape where pylons may give rise to ‘<i>substantial impacts, positive or negative, on the natural beauty and special qualities</i>’ of the National Landscape, as defined in the Development in the Setting of the Dedham Vale AONB Position Statement (National Landscape Partnership, 2024). The Applicant stands firmly by its professional judgement that the Colne Valley, including the area around Fordham, is not considered to form a part of Dedham Vale National Landscape setting.
	Question 2: How do the features of the Colne Valley measure up against the requirements for a National Landscape? A definitive opinion on whether the Colne Valley would itself merit National Landscape designation would require a considerably more detailed assessment against the statutory purpose of designation, Natural England's designation criteria and an evaluation of the area's natural beauty. Such an assessment falls beyond the scope of the technical review undertaken on behalf of Villages Against Pylons. Nevertheless, the available evidence demonstrates that the Colne Valley exhibits a wide range of valued landscape qualities. These include a distinctive river valley landform, strong scenic quality arising from the combination of wooded valley sides and open pastoral valley floor, a well-preserved historic settlement pattern, extensive public access and recreational use, relative tranquillity, important habitats including ancient woodland, and strong perceptual qualities associated with its rural character. These characteristics are consistent with many of the factors identified within the Landscape Institute's Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations, including natural heritage, perceptual qualities and recreational. Collectively, they support the conclusion that the Colne Valley constitutes a valued landscape. As such, irrespective of whether the landscape has been formally designated, it is considered to satisfy the requirements of a valued landscape referred to in paragraph 187(a) of the National Planning Policy Framework.	The Applicant responded to a similar question put forward in ISH4 as set out 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 written response was also provided in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115] (pages B6 to B7). In summary the Applicant does not judge the Colne Valley to carry the same weight as Dedham Vale National Landscape in terms of natural beauty. The Applicant notes the Landscape Institute's Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations, is concerned with appraising value outside nationally designated landscapes and is not related to the identification of landscapes that may meet national designation status. These are distinctly different matters. Paragraph 5.10.12 makes reference to locally valued landscapes: ‘<i>Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.</i>’
ISH4 Action Point 22 <i>a) Respond to comments made by Braintree DC regarding the Noise and Vibration Management Plan, as identified in the outline Code of Construction Practice [REP5-139] at NV05, including whether a stage is missing in the process regarding local</i>	Braintree District Council [REP6-139] The Council note that the ExA has asked the Applicant to respond to points made by Braintree District Council and Babergh and Mid-Suffolk District Council to do with compliance around noise and vibration. The Council wishes to take this opportunity to highlight and support the concerns raised by Babergh and Mid Suffolk District Council regarding the practical operation of compliance monitoring, reporting and enforcement arrangements more generally. Whilst the Outline Code of Construction Practice sets out processes for monitoring	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]. Refer to Item 6.3a.

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<i>authorities needing to approve the document.</i> <i>b) Respond to comments from both Braintree DC and Babergh DC and Mid Suffolk DC's regarding the complaints and enforcement procedures related to the Noise and Vibration Management Plan, especially in regard to compliance monitoring, reporting and enforcement, and how these procedures will operate in practice.</i>	compliance and responding to complaints, the Council considers that greater clarity is required regarding the interface between the Applicant's internal compliance processes and the role of local planning authorities as the enforcing authorities under the Planning Act 2008. The Council agrees that effective compliance monitoring and reporting arrangements are an important component of maintaining public confidence in the planning system, ensuring transparency throughout the construction process and enabling potential issues to be identified and resolved at an early stage. In the Council's view, a clear and agreed compliance framework would assist both the Applicant and the relevant local authorities by providing certainty regarding reporting, investigation, communication and resolution procedures. In particular, the Council considers that an agreed framework for compliance reporting, investigation of non-compliance, record keeping and ongoing liaison with enforcing authorities would assist in ensuring a transparent, consistent and proportionate approach to compliance management throughout the construction phase, whilst facilitating the timely resolution of issues where they arise. The Council therefore supports the principle that compliance arrangements should include appropriate mechanisms for ongoing liaison between the Applicant and the relevant enforcing authorities, proportionate reporting of identified non-compliances, maintenance of a clear audit trail of approved documents and plans, and appropriate opportunities for local authorities to undertake compliance and enforcement functions where necessary. The Council notes that Babergh and Mid Suffolk District Council will be providing more detailed comments on these matters at Deadline 6 and supports the general approach set out within those submissions.	
ISH4 Action Point 19 <i>Tendring DC to provide written submissions in regard to the applicant's response to ExQ2 2.S8, especially in regard to mitigation measures required, standard and/ or bespoke, in the light of the applicant's suggested potential to utilising the North Falls/ Five Estuaries haul road off Bentley Road and whether this would address the concerns it has raised to date.</i>	Tendring District Council [REP6-168] In addition to the response set out below, TDC also refers the Examining Authority to TDC's Written Summary of Oral Case submitted in respect of Issue Specific Hearing 4 (Noise and Vibration), particularly the submissions relating to Bentley Road (PAR30) – as set out in pages 2-5 above. Those submissions remain directly relevant and are not repeated in full here. Having reviewed the Applicant's response to Action Point 2.S8, TDC does not consider that the response adequately addresses the concerns previously raised. The fundamental issue remains one of certainty. The Applicant's response continues to rely upon imprecise and non-committal language. For example, the Applicant states that standard mitigation measures "may be feasible at some or all other receptors, subject to review" and that bespoke mitigation strategies "would be developed" where standard measures are found not to be feasible or effective. Such wording provides little certainty regarding: • What mitigation is actually proposed; • Which properties would receive mitigation; • Whether mitigation would be sufficient to avoid significant adverse effects; • The criteria that would be applied in determining whether standard mitigation is considered "feasible" or "efficacious"; and • How affected residents, the Examining Authority or the Secretary of State can assess the effectiveness of mitigation prior to determination of the application.	The Applicant acknowledges these points but does not agree that the proposed approach lacks sufficient certainty or departs from established NSIP practice. The Applicant considers it both reasonable and appropriate for detailed design and specific mitigation measures to be undertaken post-consent. The mitigation measures are secured by commitments in 7.2 Outline Code of Construction Practice [Revision G] and will be through agreement with the relevant local authority prior to the commencement of the works. The Applicant does not agree that significant effects can only be appropriately addressed through property-specific mitigation proposals developed during Examination. The purpose of the Environmental Statement is to identify and assess likely significant effects and establish an appropriate mitigation framework. The detailed design of mitigation is then refined through the secured post-consent processes. This does not reduce certainty regarding outcomes, as the relevant controls and approval mechanisms are secured through the DCO. The mitigation strategy does not place reliance on the potential use of the North Falls/Five Estuaries haul road. However, should it be feasible to use the North Falls/Five Estuaries haul road, then the effects will clearly be avoided at properties to the north along Bentley Road. If it is deemed not viable to use the North Falls/Five Estuaries haul road, then the strategy considers this outcome, and appropriate mitigation will be identified for properties to the north. As such, the strategy is not dependant on the use of the North Falls/Five Estuaries haul road but it is entirely appropriate to identify this as a means of avoiding potential significant adverse effects, should it be viable. If the haul road is not available, the Project remains capable of proceeding and the secured mitigation framework remains applicable.

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	The Applicant's response therefore reinforces TDC's concern that material elements of mitigation are being deferred to a post-consent stage, notwithstanding that the affected properties and the scale of impacts are already known. TDC's position remains that where significant adverse effects have already been identified, property-specific mitigation should already have been developed and presented during the Examination. The Applicant's response appears to suggest that bespoke mitigation strategies may only become necessary if future reviews determine that standard mitigation measures are ineffective. However, the Applicant has already identified the properties affected by significant adverse noise effects and has undertaken the necessary assessments to reach those conclusions. In TDC's view, once those significant adverse effects have been identified, there should be sufficient information available for the Applicant to define and assess the mitigation necessary to address them. The Examination should not be asked to rely upon a future review process whose outcomes remain unknown. TDC is also concerned that the Applicant seeks to place reliance upon the potential use of the North Falls/Five Estuaries haul road as a mechanism for reducing impacts along Bentley Road. At present, however, there is no certainty that access to that haul route will be secured or available throughout the relevant construction period. Until such arrangements are secured and legally certain, TDC does not consider that the Examining Authority or Secretary of State can place significant weight upon a mitigation measure that remains reliant upon future agreements where the outcome of such agreement is not only unknown but also outside the Applicant's full control. Indeed, the Applicant's response illustrates precisely why TDC's concerns remain unresolved. If access to the alternative haul route is ultimately not secured, then a greater number of residential properties would remain exposed to the full scale of traffic-related impacts associated with Bentley Road. In those circumstances, deferring the design and assessment of mitigation until the discharge of requirements stage would substantially limit the ability of the Examining Authority and Secretary of State to understand the likely residual effects of the development before consent is granted. There remain too many uncertainties, assumptions and dependencies for TDC to conclude that the impacts on affected residents have been adequately assessed or that effective mitigation has been secured. Vibration TDC is similarly not persuaded by the Applicant's response regarding construction traffic vibration. The Applicant's position is based upon an assumption that the local highway network is well maintained and that vibration effects arising from construction traffic can therefore be scoped out of the Environmental Statement. TDC considers that assumption to be inadequately evidenced in the specific context of Bentley Road and the surrounding local highway network. The condition of local roads can materially influence vibration effects generated by heavy construction traffic, particularly where substantial numbers of HGV movements are proposed over an extended construction period. Given the scale of construction traffic proposed on Bentley Road, and the sensitivity of nearby residential receptors, TDC considers that reliance upon a generic assumption regarding highway condition is insufficient justification for dismissing the potential for vibration impacts without more detailed, location-specific assessment –	Accordingly, the assessment conclusions are not dependent upon a future agreement with a third party. With regard to construction traffic vibration, the Applicant similarly does not agree that a location-specific traffic vibration assessment is required for Bentley Road. It is appropriate to assume that the highway network is maintained to an acceptable standard by the relevant highway authority. Traffic-related vibration is generally associated with defects in the road surface, such as potholes or localised unevenness. Where such defects exist, any resulting vibration would occur irrespective of the nature of the traffic using the road, including existing vehicles, HGVs, and agricultural vehicles. Consequently, any vibration arising from highway defects would not be attributable specifically to the Project. Responsibility for identifying and rectifying highway defects lies with the relevant highway authority. The Applicant therefore considers that the approach taken within the Environmental Statement is proportionate, evidence-based and consistent with established guidance and practice. Accordingly, the Applicant maintains that construction noise and vibration effects have been appropriately assessed and that suitable mitigation mechanisms are secured through 7.2 Outline Code of Construction Practice [Revision G] and associated management plans.

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	and this is just one factor influencing construction traffic vibration – National Grid is showing little appetite to effectively engage with multiple other factors. Furthermore, the Applicant's reliance on general construction management commitments does not address TDC's principal concern. The issue is not whether broad construction controls exist, but whether the likely vibration effects at known sensitive receptors have been properly assessed and whether any necessary mitigation has been identified with sufficient certainty to enable meaningful examination and determination of the application. Conclusion For the reasons set out above, TDC remains concerned that the Applicant has not provided sufficient certainty regarding either the nature or effectiveness of noise and vibration mitigation for affected properties along Bentley Road. The Applicant's response does not materially address TDC's central concern that known significant impacts, affecting known receptors, are being addressed through future reviews and potentially future mitigation strategies that have not yet been defined, assessed, scrutinised or secured. Accordingly, TDC maintains its position that detailed and property-specific mitigation proposals for all residential receptors predicted to experience significant adverse noise and/or vibration effects should be identified, assessed and secured during the Examination, rather than being deferred to the discharge of requirements stage following any grant of development consent.	
ISH4 Action Point 20 <i>Tendring DC: the applicant at agenda item 6.2, second bullet point, was asked to explain how the ExA can be satisfied the ‘Potential Mitigation Options’ [APP-259] at table A14.3.7 (Indicative Mitigation Options) will be adequately secured and delivered to the satisfaction of the relevant local authorities. The applicant provided a verbal response and the ExA asked whether any local authorities wished to respond. The ExA was advised Tendring DC had left the meeting but would respond in writing. Tendring DC are asked to review the recording or transcript and respond to the applicant’s submissions made during the hearing on this matter.</i>	Tendring District Council [REP6-168] Whilst TDC welcomes the Applicant's clarification that Commitment NV21 will be amended to provide for the preparation of an Operational Noise Report and consultation with the relevant local planning authority, this clarification and commitment is provided rather late in the process and TDC does not consider that the response fully addresses the Examining Authority's fundamental question of how it can be satisfied, before any DCO decision is made, that the mitigation relied upon in the assessment will in fact be secured, delivered and effective. This is and has been precisely TDC's concerns not only on this particular issue but also many other noise and vibration related matters in the Ardeigh/Little Bromley ALBA area. TDC would like to highlight the following points: The Assessment Relies Upon Mitigation Which Is Not Fully Secured The starting point is that the Environmental Statement identifies potentially significant adverse operational noise effects from the EACN Substation in the absence of mitigation. At the worst affected receptor (R10 Bounds Farm), the Applicant predicts a night-time exceedance of background sound levels of 14 dB and concludes there is likely to be a significant effect without mitigation. The conclusion that operational effects become "not significant" is entirely dependent upon substantial mitigation being delivered. Specifically, the residual assessment assumes: • 20 dB attenuation for transformers and shunt reactors; and • 14 dB attenuation for cooling systems. Without those reductions, the Applicant's own assessment concludes that significant adverse effects would arise. Again the applicant uses imprecise and unenforceable language. Specifically, the difficulty for TDC is that the mitigation measures identified in Table A14.3.7 are	The Applicant notes Tendring District Council's response. However, it is also noted that Commitment NV21 within the updated 7.2 Outline Code of Construction Practice [REP6-072] was amended at Deadline 6, subsequent to the submission of Tendring District Council's comments. The revised commitment was therefore not available for consideration at the time those comments were prepared. The revised Commitment NV21 now requires the preparation of a detailed operational noise assessment for approval by the relevant local planning authority prior to operation, together with a programme of post-commissioning noise verification measurements. In addition, operational noise limits are secured through Requirement 14 of 3.1 Draft DCO [Revision G]. Accordingly, both the assessment process and the operational noise outcomes are secured. The Applicant does not agree that the assessment relies upon mitigation that is insufficiently secured. The purpose of the assessment presented in 6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259] is to establish whether significant adverse effects could occur and, if so, whether those effects can be avoided through realistic and achievable mitigation measures. The assessment demonstrates that significant adverse effects would occur under a conservative, worst-case unmitigated scenario, but that both significant adverse and adverse effects can be avoided through standard, readily available and feasible mitigation measures commonly employed at electrical substations. The Applicant does not consider it necessary, nor is it standard practice, for every element of mitigation design to be fixed at the DCO stage. The assessment of operational substation noise has necessarily been undertaken prior to the completion of detailed design and therefore adopts precautionary assumptions regarding plant noise emissions. The assessment then demonstrates that compliance can be achieved using established mitigation measures that are routinely implemented across National Grid infrastructure.

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	expressly described as "potential mitigation options" and "indicative mitigation options" which "may be taken forward as the design progresses". The Assessment therefore relies upon mitigation which remains illustrative rather than definitively specified. A Significant Difference Exists Between What Was Assessed and What Is Secured TDC notes that, at the hearing, the Applicant explained that the residual assessment did not assume all of the mitigation options listed in Table A14.3.7. Instead, the Applicant stated that the assessment only assumes: • Standard transformer/shunt reactor enclosures providing 20 dB attenuation; and • Cooling attenuation of 14 dB. The Applicant further explained that no reliance was placed upon additional screening and that the potential plant selection reduction of up to 10 dB identified in Table A14.3.7 was not relied upon within the assessment itself. Whilst that clarification is helpful, it gives rise to a further concern. If the assessment relies specifically upon the assumed performance of acoustic enclosures and cooling attenuation measures, then TDC considers that those measures should be expressly secured within the DCO framework with sufficient precision and enforceability. At present, NV21 appears to require only that appropriate mitigation be identified during detailed design in order to avoid significant adverse effects. The commitment does not appear to secure the actual, clearly needed mitigation package (that should really be known at this stage) and assessed within the Environmental Statement, nor does it define minimum attenuation standards, enclosure performance requirements, or any equivalent design parameters against which compliance can be assessed. The Applicant instead proposes that these matters be determined at a later stage through the Operational Noise Report. This continues to defer important aspects of mitigation design until after development consent has been granted. Local Authorities Are Being Asked to Approve Mitigation Not Yet Defined The Applicant's proposed amendment to NV21 appears to rely upon the submission of an Operational Noise Report to the relevant local planning authority prior to construction. Whilst TDC welcomes the proposed involvement of local authorities, but this does not resolve the principal concern. The issue is not whether local authorities should be consulted. The issue is whether the mitigation measures on which the Environmental Statement relies should already be sufficiently defined and secured during the Examination. Under the Applicant's proposed approach: • The final plant specification remains unknown; • The final layout remains unknown; • The final mitigation measures remain unknown; • The final noise modelling remains unknown; and • The effectiveness of the final mitigation package remains unknown until after consent has been granted. In TDC's view, this leaves the local authority in the position of effectively determining whether the operational noise impacts can be made acceptable after the DCO has	Tendring District Council's submission focuses on the absence of a commitment to a specific mitigation measure, such as acoustic enclosures. However, the relevant question for the Examination is whether the required operational noise outcomes are secured, rather than whether a particular mitigation solution is prescribed at this stage. Requirement 14 and Commitment NV21 secure the operational noise performance that must be achieved. The detailed design process then determines the most appropriate means of achieving those requirements. Notwithstanding the above, the Applicant notes that the mitigation measures assumed within the assessment are neither novel nor uncertain. The assessment assumes minimum attenuation performance consistent with standard transformer and reactor enclosures and associated cooling plant mitigation measures that are routinely available and commonly utilised within the electricity transmission sector. The assessment therefore represents a conservative, worst-case mitigated scenario, based on precautionary assumptions regarding plant noise emissions together with standard mitigation measures that are well understood and readily deliverable. The Applicant therefore disagrees with the suggestion that the effectiveness of mitigation is unknown or that the assessment relies upon speculative future measures. The assessment identifies a clear and achievable route to compliance, whilst Commitment NV21 and Requirement 14 secure both the detailed assessment process and the operational noise limits that must ultimately be achieved. In summary, the matters raised by Tendring District Council are addressed through Commitment NV21 of the 7.2 Outline Code of Construction Practice [Revision G] and Requirement 14 of 3.1 Draft DCO [Revision G], which together secure the assessment, approval, verification and operational noise performance requirements for the EACN Substation.

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH4	Applicant Comments
	already been granted. That is not good practice or an approach which provides certainty to affected residents or assists the Examining Authority in understanding the true nature and extent of the effects before making its recommendation. The Applicant's Own Assessment Recognises Material Uncertainty TDC also notes that the Environmental Statement repeatedly acknowledges that the assessment is indicative and based upon indicative plant data. The document states that further assessment will be required as the design progresses and that specific mitigation measures have yet to be determined. Indeed, paragraph 14.8.1 states that further noise assessment will be undertaken based upon detailed design information to inform specific mitigation measures, whilst paragraph 14.10.6 confirms that further assessment will be required as design progresses. That acknowledgement of uncertainty sits awkwardly alongside the conclusion that significant effects can confidently be avoided. Importance to Local Residents From the perspective of affected residents, particularly those closest to the EACN such as Bounds Farm, Mayfields Farm, Hungerdown Lane properties and other nearby receptors identified within the Assessment, the present position provides limited certainty. Residents are being asked to accept that: • Significant adverse effects have been identified without mitigation; • The final operational design has not yet been fixed; • The final mitigation package has not yet been fixed; yet • The effectiveness of future mitigation can nevertheless be assumed. TDC considers to be unacceptable and is strongly of the view that residents are entitled to greater certainty than this, particularly given the permanent nature of operational substation noise and the rural character of the receiving environment. TDC's Position (summary) TDC's position remains that the Applicant's response does not fully answer the Examining Authority's question. Whilst the proposed amendment to NV21 may improve the mechanism for local authority involvement, it does not in itself demonstrate that the mitigation measures relied upon in the Environmental Statement are: • Sufficiently defined; • Fully secured; • Enforceable; • Capable of independent scrutiny during the Examination; and • Guaranteed to achieve the outcomes assumed within the assessment. Accordingly, TDC considers that further detail should be provided before the close of the Examination regarding: 1. The specific mitigation measures upon which the residual assessment relies; 2. The minimum attenuation performance standards that must be achieved; 3. How those standards will be secured through the DCO; 4. The approval role of the relevant local authority; and	

Hearing Action Point	Interested Parties' Response to Hearing Action Points at ISH4	Applicant Comments
	5. The mechanism by which affected residents can be assured that the operational noise levels assessed in the Environmental Statement will actually be achieved in practice. Until such certainty is provided, TDC does not consider that the Examining Authority can be fully satisfied that the mitigation measures identified in Table A14.3.7 and relied upon within the residual operational noise assessment will be adequately secured and delivered to the satisfaction of either the local planning authority or affected residents	
ISH4 Action Point 24 <i>Continue positive dialogue with the aerodromes where matters are outstanding. Provide an update on how you are working towards resolution of outstanding matters and towards resolution via the statements of common ground.</i>	Norfolk Gliding Club [REP6-220] The respondent considers there has been little positive dialogue with the Applicant and it is considered that consultation has become one-sided. It is unlikely there will be further discussion until the Applicant accepts their responsibilities and agreements. • The Project does not comply with National Policy Statement (NPS) EN-1. Despite identifying Tibenham as an airfield creating routeing risk, the Applicant has failed to follow that up. NPS EN-1 states that <i>'It is essential that new energy infrastructure is developed collaboratively alongside aerodromes...'</i> and 'Safety, operations and capabilities are not adversely affected by new energy infrastructure' The Project does not comply with three elements of National Planning Policy Framework paragraph 200: • <i>'...decisions should ensure that new developments can be integrated effectively with existing businesses...'</i>: A need to close runways on safety grounds cannot be construed as 'effective integration' • <i>'Existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established.'</i> It is considered that the need to close runways due to safety issues would cause an unreasonable restriction • <i>'...the applicant (or agent of change) should be required to provide suitable mitigation...'</i>: The Applicant collaborated with us from the outset and the selection of a different route alignment could have been agreed, which would have resolved all the safety issues. The choice not to do so was of the Applicant's own making. The decision by the Applicant to withhold the agreed information from the August 2025 consultation prevented any positive dialogue at the consultation, which was adjourned as a result. That information is still outstanding and it will not be possible to agree either a SoCG or AIA until it has been received in full. We recognise the tight timescales of the Examination programme; however, the decision to withhold the information was made by the Applicant.	The Applicant has responded to the Norfolk Gliding Club representation within 7.1 of 8.31 Response to the Rule 17 letter received 14 July 2026 [Revision A].

3.5 OFH4 Action Points

No action points to comment on.

4. Comments on Summaries of Oral Case from CAH3

4.1 Comments on summary of oral submission at CAH3

Table 4.1 Comments on summary of oral submission at CAH3

Party	PINS ref	Third party comment	Applicant's Response
Ward Hadaway LLP on behalf of Northumbrian Water Limited	[REP6-173]	Impact of the Project/CR1 and CR2 4 Turning to project impacts, the scheme affects a number of NWL's operational assets. Early assessment indicates that CR1 alone impacts at least four water mains, including strategic mains. If these were interfered with, up to 37,000 households and businesses could be affected, which illustrates the potential scale of disruption. NWL's assessment is ongoing, and NWL reserves its position on the full extent of impacts.	The proposed scheme does not propose or require works to restrict the flow of the four water mains noted by the respondent.
		Little Waltham Pumping Station In relation to Little Waltham Pumping Station, as made clear by our Solicitor at the April compulsory purchase hearing, this station is a critical operational asset. While the Applicant has indicated that one plot - F3/96 - will be re-classified as class 8, it is crucial that parcels F3/91 and F3/93 are also re-classified as class 8. These adjoining parcels are of vital operational importance as the asset cannot function without a secure and reliable access over these parcels, nor has the Applicant sufficiently explained why compulsory purchase powers are necessary. The Applicant has suggested that the plots adjacent to the pumping station are only needed for minor works in association with the project. In light of the minor nature of the Project works, NWL are not satisfied that reasonable alternatives have been explored by the applicant. To be clear, NWL is seeking relief through a re-classification of all 3 parcels which are F3/91, F3/93 and F3/96 as class 8 land.	The Applicant provided comments on this in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing [REP6-116] . The Applicant believes the respondents concerns over access requirements, related to plots F3/91 and F3/93, can be addressed via a commitment to provide unrestricted access which has been offered. The respondents asset protection team has indicated this solution has the potential to satisfy concerns and discussions are ongoing to confirm and agree.
		Lack of Protections and Risk of Serious Detriment As discussed by NWL at OFH4, at present, there are no agreed PPs between NWL and the Applicant. Because of this, NWL cannot confirm that the compulsory acquisition of land or rights would not cause serious detriment to NWL's ability to carry out its statutory duties.	The Applicant provided comments on this in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing [REP6-116] . The parties have agreed wording that is acceptable to both parties The Applicant has put Little Waltham Pumping Station (Plot F3/96) as Class 8 and has confirmed in the Deadline 6 PP's that access over adjoining TP plots will be maintained at all times for the benefit of the substation.

Party	PINS ref	Third party comment	Applicant's Response
		The Applicant introduced cost sharing in to the PP's being negotiated between the parties on 8 June. This approach resembles that under the New Roads and Street Works Act 1991, despite the draft Order stopping short of formally invoking those provisions. This is a serious concern. It has always been agreed that any interference with NWL assets must follow section 185 Water Industry Act 1991 that provides for a statutory form of compensation and does not allow for cost sharing. As drafted, the Applicant's proposed PPs are inconsistent and will: • give rise to disputes; • cause delays to or hinder the delivery of the Project; and • cause serious detriment to NWL carrying out its statutory undertaking contrary to ss127 and 138 of the Planning Act 2008 On 12 June NWL's solicitor wrote to the Applicant a full 12 days ahead of the CAH3 urging them to respond to the above concerns. They failed to respond to the issues On 1 July NWL's solicitor again wrote to the Applicant's solicitors urging them to respond to NWL's concerns. They responded on 3 July but wholly failed to engage with the issues. NWL's solicitors wrote to the Applicant's solicitors again on 6 July urging them for a response. At the time of writing no response has been forthcoming. The Applicant may contend that its provisions are distinct from the cost-sharing arrangements found under the New Roads and Street Works Act 1991 and are intended merely to prevent NWL receiving a financial benefit at the Applicant's expense. However, that does not address NWL's fundamental concern. The parties agree that any diversion, removal or relocation of NWL apparatus would be carried out pursuant to section 185 of the Water Industry Act 1991. NWL's position is therefore that the compensation regime prescribed by section 185(5) should apply. As demonstrated, NWL has repeatedly asked the Applicant to explain the legal basis upon which its proposed betterment, salvage and cost-sharing provisions can operate alongside, or in place of, the statutory compensation framework arising under section 185(5). Despite repeated requests, no substantive response has been provided.	

Party	PINS ref	Third party comment	Applicant's Response
		This should be a matter of concern to the Examining Authority. The issue is not whether such deductions may appear reasonable in principle. Rather, the issue is whether the Order can properly impose a bespoke compensation regime that differs from the statutory framework which both parties otherwise accept applies to diversion works. In NWL's view, the Applicant's proposed drafting creates uncertainty as to the parties' respective rights and obligations and gives rise to a material risk of future disputes regarding the funding of diversion works. Such disputes will delay the implementation of diversion works critical to the Project and cause serious detriment to NWL's ability to carry out its statutory functions. Unless the Applicant revises its position or provides a reasoned explanation addressing the legal issues raised by NWL, agreement of the PPs is unlikely to be achieved. NWL therefore invites the Examining Authority to urge the Applicant to engage directly with NWL on this issue failing which, NWL is content to share with the Examining Authority at the appropriate time or deadline its preferred PPs which are drafted in a way to avoid the inevitable uncertainty, delay and costs to the Project to which the Applicant's preferred PPs will give rise. Subject to agreement being reached on all issues, NWL must maintain its objection to the Order.	
		Questions 1. During CAH3, the Applicant was asked by the Examining Authority to provide an update on the status of the protective provisions (PPs) negotiations. The Applicant's representative stated her understanding that, NWL was "waiting to see" the outcome of the protective provisions for the Sealink project and had not responded to, or provided comments on, the Applicant's draft PP's circulated on 8 June, which introduced cost sharing for the first time. This is incorrect. As confirmed by speaking on behalf of NWL at CAH3, NWL had in fact responded to the Applicant's solicitors by way of an email dated 12 June highlighting the difficulties and potential delays and disputes that would likely give rise to by their position on the PPs and the issue of cost sharing. To date, the Applicant has failed to respond to that email or meaningfully engage on those points. NWL has made numerous requests for the Applicant to identify the legal basis on which it seeks to introduce cost sharing and anticipated costs provisions that depart from the position under section 185 of the Water Industry Act	The Applicant notes that these questions have been addressed above.

Party	PINS ref	Third party comment	Applicant's Response
		1991. To date, NWL has not received a response to those requests and CAH3 was the first time that NWL had been made aware that the Applicant has no intention of seeking to reach an agreed position on this point which NWL feels is incredibly unhelpful. 2. The Examining Authority also requested an update on the parties' respective positions regarding the classification of parcels 3/91 and 3/93 affecting Little Waltham Pumping Station. NWL has written to the Applicant to confirm that, given the Applicant's position that these parcels are only required for minor works and that a temporary supply could be obtained from NWL in the usual way, NWL sees no justification for their continued classification as Class 7 land especially given the importance of those parcels to NWL's ability to carry out its statutory functions. NWL are yet to receive a response from the Applicant on this point.	
Gowling WLG on behalf of Bloor Homes Limited	[REP6-138]	Bloor Homes have objected to both the compulsory acquisition ("CA") and temporary possession ("TP") powers sought, to the extent that these are not either reduced in size, changed to wholly temporary or regulated by a binding legal agreement to reflect the commitments given. By way of update, National Grid and Bloor Homes have now agreed to regulate the compulsory acquisition by agreement and Bloor have received a draft of that Agreement. Through that Agreement there should be collaboration and co-ordination to resolve the overarching issues during the construction, operation and maintenance of both the Project and the housing Development. In particular the development and the Project should have safeguarded areas to enable the schemes to be developed alongside each other. Include an understanding that restrictions on built development in certain areas are not intended to prevent Bloor's enabling works; and a commitment to exploring opportunities for shared facilities and materials. There is also to be collaboration over the access arrangements both permanent and temporary with the permanent access route to be varied to be routed through the Bloor Scheme. In terms of the broad location for a construction access Bloor continue to push for that being to the north of the main access to the residential development. Now that an agreement is in circulation, Bloor do just need negotiations of that agreement to proceed in earnest . We understand that the aim is to have an	The Applicant acknowledges Bloor Homes' objection to the compulsory acquisition and temporary powers sought. The parties have engaged extensively, and as detailed in 8.3.13 Statement of Common Ground – Bloor Homes [Revision C], the Applicant and Bloor Homes have agreed to enter into a legally binding agreement. Both parties are proactively engaging to finalise the agreement, which is anticipated by Deadline 8. The draft agreement includes provisions for ongoing coordination and collaboration during the detailed design stage of both developments to resolve the interfaces between the projects. The parties agree that certain areas, to be specified by the Applicant, will need to remain free from built development by Bloor Homes until the Applicant's temporary works have been completed. Similarly, the parties agree that the Applicant will not undertake any works within certain areas identified by Bloor Homes. These arrangements and implementation dates will be secured through the designation of 'Safeguarded Areas' within the legally binding agreement between the parties. Both parties will seek to accommodate reasonable requests from the other to undertake works within 'Safeguarded Areas' that do not adversely affect the delivery of the other project. The parties also agree to explore opportunities for shared facilities and materials for both temporary works and permanent facilities. Both Parties acknowledge that the design of the temporary and permanent access arrangements remains subject to further refinement as the detailed design of both the Project and Bloor Homes' development progresses. The Applicant acknowledges Bloor Homes' preference for temporary and permanent access arrangements that minimise impacts on Bloor Homes' proposed roundabout. The Applicant also acknowledges the need to continue working collaboratively with Bloor Homes to seek to identify an access route that follows, as closely as practicable, either the development's future estate roads or the existing and diverted overhead lines. The Applicant welcomes Bloor Homes' comments regarding the withdrawal of their objection upon completion of the agreement.

Party	PINS ref	Third party comment	Applicant's Response
		agreed agreement by Deadline 6. If an agreement satisfactory to Bloor is completed then Bloor Homes will be able to withdraw their objection to the compulsory acquisition powers before the close of the Examination, otherwise its objection will remain.	
ScottishPower Renewables (UK) Limited, East Anglia ONE Limited and East Anglia THREE Limited	[REP6-162]	Since the SPR Parties' Deadline 5 submission [REP5-267], the SPR Parties, the Applicant and their respective legal teams held an extensive meeting which was very productive. The key issues were discussed and it is agreed that there are three next steps: • The Applicant is to amend the draft Development Consent Order ("DCO") to correct matters raised in our Deadline 5 submission [REP5-267] and is to reclassify plot B-20/199 as Class 8 land in 4.3 Book of Reference [Revision F] and 2.2 Land Plans [Revision F]; • The SPR Parties and the Applicant will continue to work together in relation to an interface agreement to try and manage interfaces between the projects, specifically: – Bullen Lane - This is a critical means of access for EA3 and EA1 who rely entirely on Bullen Lane for access. The Project's draft DCO [REP5-060] promotes extensive compulsory acquisition of land and rights, as well as the ability to widen Bullen Lane, parts of which are public highway. The SPR Parties are content with this in principle, as long as they are afforded adequate protection to ensure access is maintained. We note that the Applicant confirmed in CAH3 that access will be maintained over Bullen Lane at all times during construction and operation and that this will be secured in the interface agreement; and – EA3 is currently still under construction and has a greater interface with the Project than EA1; • The SPR Parties have prepared bespoke protective provisions for EA3L, EA1L and SPR to ensure that if the interface agreement is not concluded before the close of the Examination, the SPR Parties are afforded some protection. These draft bespoke protective provisions have been provided to the Applicant since CAH3. As stated in our Deadline 5 submission [REP5-267], Class 8 land is defined in the Book of Reference 4.3 Book of Reference [REP4-049] as not including temporary possession rights; however the current draft DCO does not exclude temporary possession in Articles 27 (Temporary use of land by National Grid), 28	The Applicant provided comments on this in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing [REP6-116]. The Applicant has provided to SPR amended sets of Protective Provisions in respect of each of ScottishPower Renewables (UK) Limited, East Anglia ONE Limited and East Anglia THREE Limited. These Protective Provisions are included within the updated 3.1 Draft DCO [Revision G] submitted at Deadline 7. These Protective Provisions secure the Applicant's commitment to maintain access to SPR's assets and commitment to retain SPR's apparatus. The SPR/EA3 final wording of the SoCGs for SPR, EA3 and EA1 OFTO has been agreed and is submitted as final at Deadline 7 in 5.9.30 Final Statement of Common Ground - ScottishPower Renewables (UK) Limited [Revision D], 8.3.94 Final Statement of Common Ground - East Anglia 3 Three Limited [Revision A], and 8.3.45 Final Statement of Common Ground - TC East Anglia One OFTO Limited [Revision B] respectively. The parties are looking toward the documents being signed for submission at Deadline 8.

Party	PINS ref	Third party comment	Applicant's Response
		(Temporary use of land by UKPN and UKOP) and 29 (Temporary use of land for maintaining the authorised development). These articles permit the exercise of temporary possession rights over the land specified in Schedule 11 and "any other Order land", which would include Class 8 land unless expressly stated otherwise. The SPR Parties trust this will be amended in the next version of the draft DCO.	
Sheringham Shoal and Dudgeon Extensions ProjCo Limited	[REP6-163]	The Sheringham Shoal and Dudgeon Extensions project has an extant DCO, granted in April 2024, authorising transmission infrastructure and related development which overlaps with the Norwich to Tilbury application near Norwich Main Substation. Its compulsory acquisition powers have been recorded by a section 134 notice in the local land charges register. The project has secured options over two of the plots in the overlap with this application and has agreed heads of terms for a further six, with draft options issued. However, the conclusion of voluntary agreements is being impeded because there is no clear framework in place for how the overlapping compulsory powers will operate, and the project therefore cannot communicate to landowners how the schemes will work together in practice. The interrelationship report [REP4-296] identifies only 'various interfaces' between the projects, some of which give rise to conflict, including conflict in relation to CA powers. In particular, the project's cable corridor overlaps with National Grid's access and working area for pylon RG006. Acquisition of rights and use of powers in this area need to be co-ordinated. National Grid's proposed lightning strike protection area for pylon RG006 materially encroaches into the cable corridor. Despite having been asked, National Grid has not provided details of that protection or how it would affect the project's cables. There are a number of issues for which a solution has been agreed in principle, but National Grid is not making the necessary changes to the Examination documents to secure them. Those include amendments to remove the landscape planting currently shown over the permanent access to the project's substation, and amendment of the landscape planting over the 400kV cables. They also include relocating attenuation ponds away from the project but within the NTT Order limits. The project requires these changes to be secured. Our client's objections are resolvable if suitable protections are progressed. However, protective provisions, the side agreement and document changes remain outstanding and are not agreed. The parties are	The Applicant provided comments on this in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing [REP6-116]. Full details of all interactions between the Applicants proposed scheme and Sheringham Shoal and Dudgeon Extensions project are provided for in the Statement of Common Ground (8.3.10 Signed Statement of Common Ground – Equinor [Revision C]) between both parties. The Applicant has made a commitment to the respondent to move Pylon RG006 outside of the cable swathe and so the lightning strike area no longer encroaches on the respondent's cable corridor. This commitment is reflected in the 8.3.10 Signed Statement of Common Ground – Equinor [Revision C]) and the legal agreement drafting in ongoing discussions. Agreement has also been reached on the noted landscape planting and relocation of attenuation ponds, these too are reflected in the Statement of Common Ground and the legal agreement drafting in ongoing discussions.

Party	PINS ref	Third party comment	Applicant's Response
		working together; however, given the stage of the Examination, the project now considers it necessary to submit its preferred protective provisions drafting to protect its position.	
		National Grid Interactions TFP and its agents worry that the Inspectors will not have as full and completed SOCG before Deadline 7 as PINS and TFP would want, unless designs and interactions from NG increase quickly. NG have asked for FINAL comments to be in by the end of this week for final submission, but the “preliminary plan and subject to change” was only sent to TFP a week ago. TFP has recently been notified of a TCPA planning application on its land which will be filed by the end of July. This is more work for NG & TFP that could be spent on completing SOCG and pre-empts PINS decisions in an area where the designs remain “Preliminary & Subject to Change” and over Protected Lanes. The Heads of Terms remain in a state that remain impossible to sign and TFP awaits more advice from its agents and NFU and a bespoke one before engaging.	The Applicant provided comments on this in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing [REP6-116] The 8.3.32 Signed Statement of Common Ground - Tritton Farming Partnership and Brett Aggregates (Lowleys Farm Mineral Site) [Revision C] between the AP and Applicant is now in agreed form and signed. Negotiations on the voluntary agreement for Heads of Terms remain ongoing and the next meeting to progress these discussions and update the AP and their appointed agents is scheduled for 6th August 2026. This meeting will identify updated amendments and changes to the terms offered to reflect the previous engagement and feedback from the AP on the v2 HOTs issued in April.
		Great Waltham Alternative Route TFP believe the applicant has not fully appraised the alternative routes, impact to Great and Little Waltham and not been willing to move their development boundary despite additional “factors” being provided at Great Leighs and Great Waltham which were not known in 2023. Certainly, no information has been provided to TFP who maintains that the NG Great Waltham Alternative Route is more compliant with Holford Rules but has seen no working to this despite additional factors.	The Applicant considered alternative route alignments around Great and Little Waltham, see 5.15 Design Development Report [Revision B] from paragraph 9.2.17. In summary, alternative routes were considered less preferred (5.15 Design Development Report [Revision B], from fifth bullet paragraph 9.2.4). Routes further to the west of Chelmsford and routes further to the east (close to existing overhead lines) were considered. All would result in environmental effects, albeit in a different combination, and such routes are less preferred, due to their greater length, specific constraints relating to, or effects of routeing. The Applicant notes the opinion of the respondent but does not agree with their conclusions. The comparison of alternative routes was made based on an equivalent level of investigation at the time and considering the cumulative position by the comparison of whole sections between common start and end points. Our balanced decision making considering all material factors (environmental, socio-economics, technical and cost). In respect of the Lowley's minerals site, at Deadline 5 (10th June 2026) the minerals site referred to has no confirmed planning status, though is acknowledged to be under consideration. The Applicant recognises the potential change in policy status and also the potential claim for sterilised resources and is investigating (and expected to confirm) a localised change in route and pylon positioning to reduce the potential for, or value of, a confirmed claim. Whilst this reduces the cost differential, that is only one of the criteria and it remains the case that the alternative remains longer and is less preferred. Even if others would take a different view then there needs to be careful consideration of the impact of making a change. It is clear that this would, because of the need to complete ecology surveys, be likely to lead to at least a two year programme delay and would not meet the Project Need case given the status as a critical national priority project.

Party	PINS ref	Third party comment	Applicant's Response
National Highways	[REP6-154]	National Highways (NH) objects to the powers being sought over approximately 154 plots of land owned or occupied by it for the purposes of its statutory undertaking. Compulsory Acquisition powers may only be used in accordance with the statutory framework as set out in NH's previous submissions. Compulsory acquisition of operational land is not necessary The relevant works are either already authorised by the Development Consent Order (DCO), subject to Protective Provisions, or access can be secured through Protective Provisions and agreement. It is considered appropriate for NH plots to be either removed from the Book of Reference entirely or moved from being shown as Class 1 Rights plots to being Class 8 plots (effectively white land). Such an approach would mirror the approach being taken in the Oxfordshire Strategic Railfreight project interchange DCO [TR 050008]. [Applicant note: this submission has been summarised] Acquisition of rights is not necessary The Applicant already has an adequate statutory route to carry out the relevant works. In relation to overhead lines, the Electricity Act 1989 s10(1) and Schedule 4 1(1) permits overhead line works over land dedicated to public use with the consent of the street authority, such consent not to be unreasonably withheld. Article 11(6) of the DCO mirrors the Electricity Act provisions for Street Works. Article 11(7) also provides that '<i>The powers conferred in paragraphs (1) and (2) [of Article 11] are without limitation of the powers of the undertaker under the 1989 Act</i>'. S48(3) of The New Roads and Street Works Act 1991 ("NRSWA") defines "Street Works" as including the placing of apparatus or inspecting maintaining, adjusting, repairing, altering or renewing apparatus, changing the position of apparatus or removing it. Section 105 of NRSWA confirms that references to works "in" a highway include works under, over, across, along or upon it. In addition, there are powers in NRSWA that regulate the exercise of the rights. By way of an example, S51 of NSWRA means that the Applicant needs a statutory right or a licence to undertake street works but the Applicant already has a statutory right through both the Electricity Act and the DCO (as set out above) and so do not need a licence. Further, Article 3(2)(a) and (b) of the DCO authorises construction and retention of the authorised development, which includes the overhead lines.	The Class 1 land take over the SRN required for the Project is proposed to ensure that highways works and highways widening required for the project can be carried on within the adopted extents of the SRN, given the uncertainty as to limits of adoption and freehold ownership of highways which often arise, with a view to simply ensuring that the Applicant can meet any obligations under the Protective Provisions in relation to dedication/adoption and freehold transfer of highways works which would ultimately result in any land acquired being transferred to National Highways in any event. Notwithstanding this, the Applicant acknowledges that it has no intention of depriving National Highways of the freehold ownership of the route of the SRN and the protective provisions in paragraph 20 (Land) of Part 5 Schedule 16 can therefore only be exercised with the consent of National Highways. Whilst there is a difference of opinion between National Highways over the need for an easement (or in the absence of future agreement the CA of rights to oversail the highway), it is the Applicant's position that the CA of these rights is necessary and will not (notwithstanding National Highways' position on this) cause serious detriment to National Highways. National Highways are themselves in agreement that an easement is required in relation to the underground crossing due to the depth of the crossing sitting in the subsoil below the highway. The parties are negotiating an easement but this is not well advanced and in the absence of this being completed on agreed terms, the Applicant will require the rights to CA this easement in the subsoil, in the same way that other CA rights are required across the scheme as a fall back to ensure the timely delivery of the Project. Accordingly, the Applicant cannot give National Highways control over the exercise of the CA of rights at this point in time, which reflects the difference in preferred drafting of this provision. However National Highways are still sufficiently protected under the protective provisions for two reasons: First, paragraph 20 (Land) of the Protective Provisions at Part 5 Schedule 16 provides that the ability to CA rights under or over the SRN is constrained to the extent that no restrictive covenants may be imposed which conflict with the use of the SRN without the consent of National Highways, ensuring no conflicts between the rights sought and the SRN. Secondly, in light of the requirements to comply with both NRSWA and the remaining terms of the protective provisions, these ensure National Highways have full control and approval of any occupation or and works on the SRN, notwithstanding any private rights above or below the SRN. The Protective Provisions proposed by the Applicant mirror the approach to those confirmed by the Secretary of State in relation to the Yorkshire Green DCO in terms of the protection in Paragraph 20 (Land). The Applicant is also in discussions with National Highways as SRN Highway Authority to reach voluntary agreement on the operation of the Order and secure the voluntary grant of an easement in the subsoil. Notwithstanding that this is has not yet been completed, National Highways has sufficient protection in the form of the protective provisions in their

Party	PINS ref	Third party comment	Applicant's Response
		Taken together, the provisions are specifically designed to regulate utilities' interaction with highways, while protecting NH's responsibility for the safe operation and management of the highway. Accordingly, National Grid can undertake overhead line works without the need for compulsory acquisition and the inclusion of NH plots is not necessary or proportionate as required by the compulsory acquisition guidance. NH understand that the Applicant does not wish to rely on those public law powers and instead seeks an easement. The Applicant's proposed approach would convert a public regulatory issue into the acquisition of private rights over public highway land, granting private rights in airspace that is also subject to the statutory rights of other undertakers. This is objectionable in principle. Any legitimate concerns as to safety, access, maintenance, clearances, asset protection or future highway operation can be addressed through the street authority consent process, protective provisions, technical approvals and conditions. Those mechanisms are more targeted and proportionate than the acquisition of permanent rights. Nor is it sufficient for the Applicant to say that an easement is the "safest" way of proceeding. Compulsory acquisition powers must be justified by reference to necessity, proportionality and a compelling case in the public interest. A preference not to rely on existing statutory powers does not meet that threshold. The Applicant has not demonstrated that the existing statutory regimes would prevent the authorised development from being constructed, retained or maintained. On other Projects (Yorkshire Green and Cambridgeshire Wastewater Treatment Plant), differing rights have been pursued. Further submissions from NH would be forthcoming in relation to the above following further legal analysis. NH note that the easement position at Cambridge Wastewater is not comparable to the Norwich to Tilbury DCO easement position on the basis that Cambridge Wastewater relates to an underground pipe whereas the easement issue in this case relates solely to the overhead lines. Where an underground cable may require an easement, because the proposed cable depth falls within the subsoil, NH is prepared to grant such easement by agreement. [Applicant note: this submission has been summarised]	favour as included in Schedule 16 of the Order.

Party	PINS ref	Third party comment	Applicant's Response
		Post Hearing Update It is acknowledged by NH that there are less than seven weeks before the end of the Examination Period. NH is keen to move matters forward with the Applicant. However, and as noted by the Applicant, it is possible that there may be two different versions of the Protective Provisions (Applicant set and NH set). The Applicant also noted that it was the intention of the parties to schedule a meeting for the week following the hearing. Whilst there has been some correspondence in relation to a meeting, to date no further meeting has been scheduled. NH are keen to continue working with the Applicant to resolve all outstanding matters. NH look forward to the Applicant's further submissions as to why an easement for the overhead line is necessary and how that requirement accords with the compulsory acquisition statutory framework.	The Applicant notes National Highways' proposed amendments to the Protective Provisions set out in [REP6-155] . Discussions between the parties remain ongoing with a view to agreeing a final set of Protective Provisions, and National Highways' proposed amendments are being considered as part of those discussions.
		Agenda Item 5 There is a concern that agreement will not be reached on the form of NH's Protective Provisions. Please see NH's comments on Deadline 5 submission, submitted at Deadline 6 which comments on the Protective Provisions within the draft DCO submitted at Deadline 5.	The Applicant notes National Highways' proposed amendments to the Protective Provisions set out in [REP6-155] . Discussions between the parties remain ongoing with a view to agreeing a final set of Protective Provisions, and National Highways' proposed amendments are being considered as part of those discussions.
Dick Lanham	[REP6-196]	My objection relates to the compulsory acquisition of rights over our home and farming business at <i>[Redacted]</i> . A significantly less harmful alternative access route exists, using the existing public highway directly to the field containing the proposed pylon and a gateway that National Grid already has permission to use. No explanation has been provided as to why this alternative route cannot be used. Our land agent confirms discussions are still ongoing in an attempt to remove the permanent access from <i>[redacted]</i> and relocate it onto the neighbouring access track. Whilst <i>[redacted]</i> makes clear there is no guarantee this will be achieved, this correspondence demonstrates that relocating the access remains under active consideration. If National Grid is still attempting to move the access elsewhere, it follows that the current route cannot reasonably be said to be the only available option. [Applicant note: this submission has been summarised]	The Applicant refers the AP to its response in 8.14 Schedule of affected persons objecting to CA or TP of their lands or rights [Revision D] and to item 2.6 of 8.31 Response to Rule 17 Letter received 14 July 2026 [Revision A] , referring to Clare Lanham and Dick Lanham.
		Inconsistent information regarding the intended use of the permanent access During the hearing, the Applicant explained that once construction had finished, the permanent access would simply remain for occasional routine maintenance.	The Applicant confirms access will not be utilised by the Applicant for the construction of the scheme, however the clause 4 referred to is for the operation and maintenance of the scheme in future years and will cover issues such as provision of track matting. This matter will be picked up at the next round of discussions with the AP's agent.

Party	PINS ref	Third party comment	Applicant's Response
		However, the Heads of Terms provided to us by Fisher German tell a very different story. Section V – Permanent Access Easement, Clause 4 states that National Grid requires entry: “...for the purposes of construction and associated works and to carry out all works required by the Grantee to construct, lay and render operational the access ways...” The clause goes on to include: • Excavation • Creation of temporary access roads • Resurfacing • Testing • Protecting works • Drainage works • Dewatering works These rights go considerably further than the explanation given during the hearing that the permanent access would simply remain for occasional maintenance purposes. This apparent inconsistency is extremely concerning because the extent of the rights being sought goes directly to the level of interference with our home and farming business. [Applicant note: this submission has been summarised]	The wording should be updated when the HoTs are finalised to remove the generic reference to construction rights and only refer to maintenance access. The Applicant hopes this clarification will be of comfort to the AP.
		Lack of transparency Eight weeks since the hearing, a plan showing the permanent access has still not been provided to us by the Applicant. In addition, no correspondence has been received explaining: • Exactly what activities the permanent access rights are intended to authorise • Whether those rights extend beyond occasional maintenance • Why our alternative access route has been rejected • Why National Grid considers compulsory rights through our home to be necessary This Examination process should be transparent and as affected landowners we should understand exactly what rights are being sought over our property and why. Whether the access is temporary, permanent or occasional, the impact is exactly the same. Every single occasion that vehicles enter through our residential entrance it affects our privacy, security and enjoyment of our home. Every entry creates safeguarding concerns and biosecurity concerns for our farming business. Every entry disrupts the operation of our livestock enterprise. The existence of those permanent	The plans have been shared in meetings with the Affected Parties are working plans that are subject to change. The Applicant directs the Affected Party to the PINS project website and 2.2 Land Plans - Section G (Revision F) and the 2.3 Works Plans - Section G [REP5-021]. The Applicant confirms that as part of the ongoing discussions with the agents' groups, of which the AP's agent forms part, rev 3 of the Heads of Terms will clarify the permanent access rights sought. Those rights will not extend beyond occasional access. The Applicant confirms the alternative access has not been rejected – please see the response in 8.31 Response to Rule 17 Letter received 14 July 2026 [2.6] referring to Clare Lanham and Dick Lanham, for the current position on issues surrounding the review of the proposed access route and the additional landowners that would be required to enter into voluntary negotiations. The alternative access, which lies outside the project Order Limits is being reviewed in parallel with voluntary negotiations for the option inside the Order Limits. The Applicant understands the concerns around biosecurity and safeguarding, however the access off the highway to the family home is shared by the AP's working farm. The Applicant notes that the permanent access proposed is already used as the existing access to the farming operation. The Applicant is willing to work with the AP to adhere to the existing biosecurity mitigations in place. At the meeting in May with the AP's agent mitigations around biosecurity and the potential for additional gates were discussed and the Applicant awaits the AP's feedback on these solutions whilst the alternative access is reviewed in parallel.

Party	PINS ref	Third party comment	Applicant's Response
		rights fundamentally changes how we are able to live in and operate our home and farm. The Applicant must demonstrate that there is a compelling case in the public interest and that the compulsory acquisition of rights is necessary and proportionate. We respectfully ask the Examining Authority to take into account: • The existence of a viable and practical alternative access route • The fact that National Grid has never provided any explanation whatsoever as to why that alternative cannot be used • The continuing discussions regarding relocating the permanent access away from [redacted] • The inconsistency between the Heads of Terms and the explanation given during the hearing regarding the intended use of the permanent access • The lack of transparency throughout this process • The unnecessary and disproportionate interference with our home, our family life and our farming business [Applicant note: this submission has been summarised]	
Lower Thames Crossing (LTC) Project	[REP6-153]	There is significant overlap between the Applicant's Project and the LTC Development Consent Order (DCO). The primary concern relates to the significant spatial and temporal interactions between the Projects, demonstrated by the fact that there are over 700 interfacing plots. The Applicant's and LTC's technical team have been meeting regularly in order to discuss issues with the aim of working towards a side agreement. However, this is unlikely to be reached therefore LTC would be seeking Protective Provisions in the Norwich to Tilbury DCO for the benefit of the LTC Project. The proposed Protective Provisions have been provided as part of LTC's Deadline 6 response. [Applicant note: this submission has been summarised]	The Applicant acknowledges that there will be a broad spatial and temporal overlap between the NTT Project and the LTC Project and that based on analysis being undertaken by the two Projects in relation to the two sets of Land Plans, there are circa. 700 plots in which there could be some form of interaction. The Applicant agrees that the two Projects have been engaging since April 2022, with more detailed conversations about the Project interactions from 2024 and that ongoing engagement is key in ensuring that both Projects can come forward and co-exist. 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 parallel, the Projects have been in discussions regarding a set of bespoke protective provisions and the Applicants notes that LTC has submitted their preferred version at Deadline 6. Having had the opportunity to review those, the Applicant has included its preferred form of protective provisions within Part 17 of Schedule 16 of the 3.1 Draft DCO [Revision G] submitted at Deadline 7. A detailed justification as to the substantive changes sought by the Applicant to those protective provisions is included within 8.7 Statutory Undertaker Tracker (Final Issue F). In parallel, the Applicant has shared its preferred form of protective provisions with LTC. Whilst there has been helpful engagement between the parties on all outstanding points of drafting prior to Deadline 7, the Applicant expects those discussions to continue

Party	PINS ref	Third party comment	Applicant's Response
			immediately following Deadline 7, with the intention of reaching substantive agreement as to the form of protective provisions by Deadline 8.
		Other Delivery Interface Issues There are a number of construction and delivery interface issues (including but not limited to: • Delivery of transmission cables under the LTC alignment • The timing of outages to enable overhead line works • Construction traffic routing • Construction site access • Land acquisition and use of overlapping plots LTC has submitted Protective Provisions in favour of the LTC 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. [Applicant note: this submission has been summarised]	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 paragraphs [1.8.48] to [1.8.60] of 8.29.8 Application under Section 127 and Section 138 of the Planning Act 2008 (National Highways) [Revision A]. The Applicant has explained its position in relation to the protective provisions in its response above.
Palmer & Klein Limited	[REP6-221]	A timetable of engagement and a target date for agreeing Commitments has been agreed with the Applicant. The Applicant agreed to rapidly progress the advanced payment compensation mechanism by way of a side letter. Heads of Terms for the advanced compensation mechanism (by way of mitigation) have been proposed and also a proposed a timetable of engagement and target date for completion of an agreement to go on the Commitment Register (before the end of Examination). The Applicant's substantive response is awaited, noting that while engagement is welcome, if it is not followed-up with decisions and action, it doesn't achieve anything (nor satisfies government policy in relation to a DCO developer's approach to the acquisition of land and rights). [Applicant note: this submission has been summarised]	The Applicant has been engaging with the landowner positively and constructive steps have been made in reaching a solution. The Applicant most recently met with the landowner and their agent on 10 July 2026 and 15 July 2026. In response to these meetings, the Applicant has amended the timing of bore hole surveys to allow a suitable position to be reached with the Environmental Agency, prior to any such works taking place. In addition, the Applicant is drafting an advanced payment compensation mechanism document, a copy of which was shown on screen to the landowner and their agent on 15 July 2026. The Applicant expects to be able to share a draft of this with the landowner and their agent shortly after Deadline 7. Notwithstanding, both parties to the agreement accept there is a myriad of information to be included from both parties in order to formalise such an agreement, and the Applicant will continue positive engagement to reach an agreeable solution.
Affected Parties represented by Whirlledge & Nott, Brooks Leney, Clarke & Simpson and Durrants	[REP6-174]	Heads of Terms Engagement <i>A summary of the engagement to date with the agents'</i> Despite National Grid's assertions, affected parties contend that NG is failing to engage adequately or reasonably. Time is also continuing to run down and, as at the date of this submission, affected parties have still not received updated Heads of Terms and therefore remain unable to confirm whether agreement can be reached.	The Applicant does not agree that it has failed to engage adequately or reasonably with affected parties and their representatives. The Applicant has engaged throughout the pre-Examination and Examination stage and continues to correspond, hold meetings and negotiate with landowners and their agents in an effort to progress voluntary agreements. To progress negotiations efficiently and focus on key commercial principles, the Applicant and its agents Fisher German have met regularly with eight land agent firms representing a significant majority of the PILs to agree the form and content of a generic template v3 Heads of Terms.

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			The Applicant has sought feedback and amendments to the Heads of Terms through the following meetings: <table><tr><th>Group</th><th>Participating firms</th><th>Dates</th></tr><tr><td rowspan="4">Suffolk & Essex Agents</td><td>Brooks Leney</td><td>13 May 2026</td></tr><tr><td>Whirledge & Nott</td><td>4 June 2026</td></tr><tr><td>Clarke & Simpson</td><td></td></tr><tr><td>Durrants</td><td></td></tr><tr><td rowspan="5">Norfolk Agents</td><td>Brown & Co</td><td>23 April 2026</td></tr><tr><td>Bidwells</td><td>11 May 2026</td></tr><tr><td>Ceres Rural</td><td>19 June 2026</td></tr><tr><td>Savills</td><td></td></tr><tr><td>(including National Farmers Union)</td><td></td></tr><tr><td rowspan="4">Brooks Leney Clients</td><td rowspan="4">Brooks Leney</td><td>15 April 2026</td></tr><tr><td>6 May 2026</td></tr><tr><td>14 July 2026</td></tr><tr><td>(thereafter participated in Suffolk & Essex Group meetings)</td></tr><tr><td rowspan="3">Whirledge & Nott Clients</td><td rowspan="3">Whirledge & Nott</td><td>20 April 2026</td></tr><tr><td>(thereafter participated in Suffolk & Essex Group meetings)</td></tr><tr><td>15 July 2026</td></tr></table>	Group	Participating firms	Dates	Suffolk & Essex Agents	Brooks Leney	13 May 2026	Whirledge & Nott	4 June 2026	Clarke & Simpson		Durrants		Norfolk Agents	Brown & Co	23 April 2026	Bidwells	11 May 2026	Ceres Rural	19 June 2026	Savills		(including National Farmers Union)		Brooks Leney Clients	Brooks Leney	15 April 2026	6 May 2026	14 July 2026	(thereafter participated in Suffolk & Essex Group meetings)	Whirledge & Nott Clients	Whirledge & Nott	20 April 2026	(thereafter participated in Suffolk & Essex Group meetings)	15 July 2026
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			Draft Heads of Terms have been the subject of ongoing review and negotiation, including consideration of comments received from landowners' representatives. Discussions remain ongoing in respect of many holdings and the Applicant remains committed to continuing engagement with the aim of resolving outstanding issues wherever possible before the end of examination and will continue engagement following the close of examination. The latest of these meetings with Brooks Leney took place on Tuesday 14 July 2026, meetings were also held with Whirledge and Nott and Clarke and Simpson on 15 July 2026 to progress negotiations on the v3 Heads of Terms, copies of which were issued in advance of these meetings.																																		
		Outstanding Heads of Terms Issues The following issues remain unresolved: Landowners are required to use “best endeavours”, rather than “reasonable endeavours”, to secure consent from tenants, occupiers and mortgagees. This is an unreasonable burden. “Best endeavours” could require a landowner to take extreme and disproportionate steps. “Reasonable endeavours” is sufficient.	The Applicant respectfully does not agree that a number of points remain unresolved regarding the draft Heads of Terms and associated land rights documentation. The Applicant has been actively engaged in discussions with the agents to provide comfort on a number of points raised by the agents. A template detailing these amendments was presented to the agents on 13 July 2026, with meetings to discuss further details held on 14 July 2026 and 15 July 2026. The Heads of Terms remain subject to ongoing discussion and negotiation with affected landowners and their representatives, and the Applicant continues to engage constructively to seek resolution of outstanding points. The Applicant considers that the provisions proposed are appropriate and proportionate to secure the land rights required																																		

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		- The Heads of Terms restrict landowners from participating constructively in the DCO process. - The assignment provisions are too wide. National Grid already has sufficient rights to assign to Ofgem-licensed entities. A general ability to assign to any party goes beyond what is necessary. - The provisions relating to schedules of condition lack sufficient detail, particularly in relation to soil testing and baseline soil condition. - The Heads of Terms should expressly state that they do not override statute and that landowners remain entitled to any compensation available under statutory provisions. - There is no clear confirmation that landowners can submit annual claims for crop loss and disturbance. If claims cannot be submitted until the end of the project, this could create significant cash flow difficulties. - There is no longstop date requiring National Grid to complete the Deed of Grant. National Grid should not be able to install or energise equipment without completing the deed and paying the balancing payment. - Clarity is still required on safe working distances beneath overhead lines. If land beneath the lines cannot be safely worked, compensation must reflect the full sterilised area, not just the tower bases. - Further information is required on irrigation beneath the lines. - Further information is required on excavation depths and working distances, particularly where quarrying operations are affected. - The definitions remain unclear and inconsistent in places. - The temporary compound lease Heads of Terms omit several basic commercial lease provisions, including insurance, indemnity, dispute resolution, drainage, services, pollution controls and CPI review. We also consider that the completed Option Agreement should include a separate Construction Practice Addendum. This should set out the minimum practical requirements necessary to inform the Code of Construction Practice including: - Agricultural Liaison Officer services; - records of condition; - land drainage;	for the construction, operation and maintenance of the Proposed Development, whilst protecting the interests of affected parties. Matters relating to endeavours, obligations, assignment provisions, schedules of condition, compensation entitlement, crop loss and disturbance claims, deed completion arrangements and other drafting points remain under active review and discussion between the parties. The Applicant notes that entitlement to compensation is governed by the statutory compensation code and is not displaced by any voluntary agreement. In relation to agricultural matters, the Applicant recognises the importance of issues such as soil management, drainage, irrigation, biosecurity, records of condition and reinstatement. These matters are being considered through ongoing engagement with landowners and their advisers and, where appropriate, are addressed through 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D], Requirement provisions and project-specific discussions. The Applicant will continue to engage with the representatives of affected landowners to seek agreement on these matters and to progress voluntary agreements wherever possible. Many of the points raised here have been addressed in the recently re-issued version 3 Head of Terms and the Applicant's position confirmed at the meetings with the agents held on 14 July 2026 (Brooks Leney) and 15 July 2026 (Clarke & Simpson, Whirlledge & Nott) as referenced above. These include: - Replacing 'best endeavours' with 'reasonable endeavours'. - The Applicant does not agree that the Heads of Terms restrict landowners from participating constructively in the DCO examination process. Landowners and their representatives have actively engaged throughout the Examination, submitting representations and comments on matters relevant to their land interests. The Applicant welcomes and continues to consider land-specific feedback and practical matters raised in relation to individual holdings. The assignment provisions have been clarified. - The Applicant has submitted 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D] as part of the DCO examination which should provide further comfort on soil management. - Clarification that any future compensation claim should be brought pursuant to the Compensation Code. - A suite of documents available on the Applicant's website and on the NTT Project page on the Planning Inspectorate Website (submitted as part of the DCO) were shared with the land agents via email on 13 July 2026 to clarify points, including safe working distances and the soil resource plan. It is the Applicant's intention, that hyperlinks or reference to these documents will be shared again when the V3 Heads of Terms are sent to individual landowners. - A summary on the restrictions related to quarrying in proximity to pylon bases was provided via email to a representative of Brooks Leney on 14 July 2026. Further information can be found in the documents shared via email on 13 July 2026. - Definitions have been revised in the latest drafting. - If an AP has a compound lease impacting their land, the AP's agent can request a copy of this on a case-by-case basis, which will provide the necessary information where applicable. - In relation to the fourth bullet point above, there are a number of resources on the NTT Planning website and the Applicant's website which provide comfort on concerns

Party	PINS ref	Third party comment	Applicant's Response
		- soil management before, during and after construction; - irrigation systems; - existing water supplies; - soil reinstatement; and - biosecurity.	raised by the AP's agent (these include, the 7.2 Outline Code of Construction Practice [Revision G], the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D], the 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D], Guidance on Land Rights for New Electricity Transmission Assets (England and Wales), Design guidelines for development near pylons, and high voltage overhead powerlines, and Land Rights Strategy and Payment Schedule for Assets. A hyperlink to a number of these have been provided to the AP's agents who submitted this response via email on 13 July 2026.
		Draft Deed of Easement Version 3 was the first time we saw what National Grid is seeking in the Deed of Easement. The rights they seek appear wider than necessary and have not been justified on a holding by-holding basis. For example, they include rights to enter land by any access route National Grid considers reasonable, despite specific access routes being shown in the DCO application and despite repeated assurances that routes would be agreed pragmatically with landowners. The draft easement also includes drone rights, but without clear safeguards regarding notice, timing, or data protection. The proposed restrictions are also significant. These include previously undisclosed controls on vegetation within a 30 metre radius of tower bases and restrictions on crops over 1 metre high. This could affect normal farming operations, including crops such as oilseed rape and maize, and places management burdens on landowners which do not appear to be properly reflected in the proposed compensation.	The Applicant notes the concerns raised regarding the draft Deed of Easement. The Heads of Terms version 3 that has now been issued to the agents clarifies the position regarding a number of points relating to drafting contained within the Deed of Easement. Once an agreed position has been reached on the Heads of Terms solicitors will be instructed by both the Applicant and on behalf of the APs clients to negotiate and finalise the Deed of Easement, which is standard practice on DCO schemes of this nature. The Applicant considers that the rights sought are necessary and proportionate to facilitate the construction, operation, inspection, maintenance, repair, replacement and renewal of the Proposed Development and are consistent with the rights sought through the DCO application. The precise terms of any voluntary agreement, including provisions relating to access, use of technology, operational restrictions and landowner protections, remain subject to ongoing engagement and negotiation. The Applicant will continue to discuss these matters with affected landowners and their representatives to seek to address site-specific concerns where appropriate. The Applicant acknowledges the concerns raised regarding farming operations, vegetation management, crop restrictions and compensation. The extent of any operational restrictions will depend on the specific circumstances of the affected land and infrastructure, and any entitlement to compensation will be assessed in accordance with the statutory compensation code and the terms of any agreed voluntary rights.
		UKPN We have also still not seen any Heads of Terms from UKPN in relation to local distribution network alterations. It has been suggested these may not be available until after the Examination. Landowners cannot be expected to agree terms, nor should the DCO be approved, whilst the terms relating to fundamental works affecting these holdings remain unknown.	The Applicant notes the concerns raised regarding the timing of discussions and agreements relating to UK Power Networks (UKPN) works. The Applicant continues to engage closely with UKPN regarding the design and delivery of any required local distribution network diversions and alterations. The precise rights and agreements required for UKPN works will be dependent on the detailed design of those works and are being progressed through ongoing discussions between the Applicant and UKPN. The Applicant does not agree that the absence of concluded agreements in relation to UKPN works prevents the Examining Authority from assessing the Application or the Secretary of State from determining the DCO application. The Applicant will continue to facilitate engagement between affected landowners and UKPN as the detailed design develops and will seek to ensure that affected parties are provided with appropriate information as it becomes available.
		Consultation and Engagement The lack of early, site-specific engagement is now creating practical problems. The red line has been fixed, and National Grid is saying it cannot agree changes outside it, even where relatively minor	The Applicant does not agree that there has been a failure to undertake meaningful engagement or to consider less intrusive alternatives. The Proposed Development has been subject to extensive consultation and an iterative design process, during which feedback from landowners, statutory bodies and other stakeholders has informed a range of design changes aimed at reducing impacts where reasonably practicable. Once the application was submitted, the Applicant's ability to make changes became constrained

Party	PINS ref	Third party comment	Applicant's Response
		adjustments would reduce operational impact, environmental harm or nuisance. In some cases, National Grid accepts that landowner proposals make practical sense, but we are then told it is too late to amend the plans. Landowners are therefore being asked to accept impacts that would have been avoided because meaningful engagement has come too late. In our view, this demonstrates a failure to properly consider less intrusive alternatives at an early stage, before seeking extensive compulsory powers over private land. There also remain significant technical unknowns. For example, National Grid has not provided clear answers regarding line heights and safe working distances. A combine harvester with a grain tank lid and auger can exceed 5.7 metres in height. HSE guidance refers to minimum line heights from the ground of around 7.3 metres. Without this information, landowners cannot properly assess whether normal farming operations can continue safely, what operational restrictions may arise, or what long-term impact this may have on the use and value of their land. NG suggest it is for landowners to operate safely within proximity of the apparatus. This may be so. However, NG is proposing to install apparatus which itself creates additional operational risk and management burden, which could be avoided / mitigated within the design process.	by the need to maintain a consistent and assessable application, although the Applicant has continued to consider site-specific matters and mitigation measures through ongoing engagement. The Applicant also does not agree that landowners have been provided with insufficient information to understand the effects of the Proposed Development. Information relating to the design, construction and operation of the overhead line has been provided through the application documents and ongoing engagement. The infrastructure will be designed, constructed and operated in accordance with applicable safety standards and regulatory requirements. Land beneath and adjacent to overhead lines will, in many circumstances, remain available for agricultural use, and the Applicant continues to engage with affected landowners regarding site-specific operational considerations. Any impacts on land use or farming operations will be considered through the relevant compensation processes where appropriate.
		Site-Specific Matters We have attended numerous meetings on site-specific matters. However, we have not received firm commitments that the accommodation works discussed will be provided. We have not received clear timescales for the works, meaning landowners cannot properly understand or plan for the disruption. We remain concerned that the DCO may grant broad compulsory powers without binding National Grid to deliver site-specific mitigation measures. This leaves landowners with little certainty regarding how the scheme will operate in practice and places them in a position of ongoing uncertainty. The concern is that National Grid is seeking to secure compulsory powers first, whilst deferring important mitigation, accommodation works and compensation discussions until later. Once those powers are granted, the incentive to negotiate meaningfully and resolve outstanding issues is materially reduced. We request that National Grid provide affected parties with sufficient clarity now so landowners can make informed decisions	The Applicant does not agree that it is seeking compulsory powers whilst deferring meaningful engagement on mitigation and accommodation works. The Applicant has undertaken extensive engagement with affected landowners and their representatives and has held numerous discussions regarding site-specific concerns, accommodation measures and potential mitigation. The Applicant remains committed to continuing these discussions and, where appropriate, identifying practicable measures to reduce impacts on individual holdings. The Applicant acknowledges that not all matters have been agreed at this stage. However, the level of detail available for certain accommodation works and mitigation measures will necessarily evolve as the detailed design progresses. The DCO framework, together with the Requirements, Code of Construction Practice and other certified documents, provides controls and commitments that will govern the delivery of the Proposed Development. As highlighted at CAH2, the Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and regular twice weekly meetings are conducted to triage, seek to identify common themes across PILs and identify and seek the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process and does not anticipate that the register will close for requests and consideration in the future. The focus at this time continues to be the matters that should be negotiated as part of

Party	PINS ref	Third party comment	Applicant's Response
		regarding businesses, development plans and future operations aimed at mitigating the impact of the scheme. Without that certainty, landowners are being forced to make significant decisions today without knowing whether National Grid will later recognise the consequences of those decisions as legitimate heads of compensation. Greater engagement now would help parties find common ground and avoid unnecessary disputes in the future.	Heads of Terms 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. The Applicant does not agree that the grant of compulsory acquisition powers would reduce the incentive for continued engagement. The Applicant remains committed to seeking voluntary agreements wherever possible and to continuing discussions with landowners regarding accommodation works, construction arrangements, mitigation and compensation. Entitlement to compensation will continue to be assessed in accordance with the statutory compensation code. The Applicant recognises the importance of providing landowners with sufficient information to understand the effects of the Proposed Development and will continue to engage with affected parties as the design develops and further details become available.
Charles Micklem	REP6-183	I submit the following representation on behalf of the Langleys Estate regarding National Grid's use of Section 172 notices and its engagement with affected landowners. Section 172 Notice – Intrusive Survey Licence On 25 February 2026, I received a proposed intrusive survey licence relating to our land. Having reviewed the licence, I raised concerns regarding the level of compensation proposed for the boreholes. Fisher German requested evidence in support of my position, which I provided promptly. This included evidence demonstrating that artificial fertiliser is more expensive than organic manure and that the proposed compensation did not adequately reflect the impact on our farming operations. Following submission of that evidence, I repeatedly sought a response. I made numerous telephone calls, sent further correspondence and raised the matter directly with National Grid representatives following the previous Compulsory Acquisition Hearing. Despite these repeated attempts, more than four months passed without my question being answered. Instead, on 1 June 2026, Fisher German advised that a Section 172 notice had been prepared. National Grid confirmed this on 3 June 2026. The Housing and Planning Act 2016 and the Government's guidance on compulsory purchase place significant emphasis on meaningful engagement with landowners and making genuine attempts to reach agreement before statutory powers are exercised. In my case, the only response to my outstanding query was that the matter remained under investigation. No substantive answer was provided despite repeated requests. At no stage did I delay or obstruct the process. Whenever information was requested, I responded either the same day or the following day. In an attempt	The issues surrounding the Applicant's approach to its powers under section 172 of the Housing and Planning Act 2016 have been answered at CAH3 and in writing at Deadline 6. The Applicant refers the affected party to the response in document 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]. The Applicant is committed to meaningful engagement with landowners to secure voluntary access for surveys before relying on its statutory powers of access under section 172. The Applicant has engaged with the affected party and its agent regarding survey access. The Applicant appreciates the workaround proposed by the affected party whilst the response is awaited from the relevant water authority. The Applicant has issued to the affected party a revised survey licence excluding the borehole. The Applicant understands that the affected party intends to return the revised licence this week. The Applicant continues to engage with the affected party and its agents regarding the relevant ownership details, given that recent transfers of ownership are yet to be registered at the Land Registry.

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		to resolve matters, I proposed that the boreholes be removed from the licence until my concerns had been addressed, confirming that I would then be prepared to sign the licence. Initially, that proposal received no response. However, on the morning of the hearing on 24 June 2026, I received an email at 9:30 am stating: "Regarding the borehole matter, my client would be willing to accept the return of a signed licence for all surveys as currently suggested, with the caveat that the borehole surveys will not be undertaken until either (A) we have a response from Anglian Water confirming our understanding that this is not a matter of concern, or (B) we have reached agreement between ourselves in written form." This represented the first meaningful progress after more than four months. Following the Compulsory Acquisition Hearing, National Grid also confirmed that a revised licence would be issued removing the boreholes from both the licence and accompanying plans. As of 7 July 2026, that revised licence had still not been provided. Despite those discussions remaining unresolved, I was served with a Section 172 notice on 30 June 2026. The accompanying letter was dated 22 June 2026, the day before the hearings commenced. The letter states that: "Unfortunately, National Grid has been unable to agree the terms for voluntary access.". This to me doesn't follow government guidelines as they are not answering my question and have not taken all steps to get a voluntary agreement. I have asked National Grid to prove that the notice was served legally and I am waiting for their reply. In my submission, that statement does not accurately reflect the circumstances. Agreement had not been reached because National Grid had not responded to a legitimate question that had remained outstanding for more than four months, despite repeated requests. It was not the result of any refusal by the Langleys Estate to engage. For those reasons, I question whether the statutory preconditions for serving a Section 172 notice had been satisfied. I also request that National Grid demonstrate that the notice was lawfully served and complied with the relevant statutory requirements. More broadly, this sequence of events gives the impression that where legitimate questions remain unanswered, statutory powers may nevertheless be relied upon instead of continuing meaningful engagement. I respectfully submit that this is	

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		inconsistent with the principles of fairness and negotiation that underpin Government guidance. Section 172 Notice Served on My Tenants My second concern relates to a separate Section 172 notice served on my tenants. No notice was served on me as the landowner, despite National Grid's Land Rights Tracker correctly identifying me as the owner and despite both National Grid and Fisher German holding my correct correspondence address. Furthermore, National Grid had not engaged with me regarding the proposed licence before serving notice on my tenants. This was particularly significant because execution of the licence by the tenants would have placed them in breach of their obligations under their Agricultural Holdings Act tenancy. On 9 June 2026, my agent specifically informed Fisher German of the ownership position. Following internal enquiries, Fisher German confirmed that it had nevertheless been instructed to proceed with service on the tenants. After I challenged the notice, I was informed that it had been issued in error and would be withdrawn. However, written confirmation that the notice was "not deemed as validly served" was not provided until 24 June 2026 at 9:26 am, four days after I first raised the issue and four days after National Grid had verbally acknowledged that the notice was invalid. Although National Grid accepted that the notice had been issued in error, site notices continued to remain displayed around the farm. If the notice had genuinely been withdrawn, it is difficult to understand why those notices remained in place. This raises an important question. Had I not researched the relevant legislation and challenged the validity of the notice, would National Grid have continued to rely upon it? It appears that the notice was only withdrawn after its defects had been identified. During the hearing, [redacted] stated: "The recent Section 172 notice was issued in error, as you heard. No site notices or hand delivered notices accompanied that." That statement was incorrect. Site notices did accompany the notice. During the hearing, I referred to the notice displayed on Chatham Hall Lane, which was subsequently removed. However, I did not refer to the second notice displayed on Scurvy Hall Lane. As of 7 July 2026, that notice remained in place despite me bringing it to the attention of a National Grid representative on the following day.	In order for the Applicant to use its powers of entry for survey access under Section 172 of the Housing and Planning Act 2016, the Applicant must give notice to "every owner and occupier" of the relevant land. The affected party informed the Applicant that its occupier could not provide the Applicant with access to the relevant land. As a result, the Applicant took steps to prevent service of the relevant notices, with a view to engaging further with the affected party for a voluntary licence. However, some notices were unfortunately already in the post. The Applicant continues to engage with the affected party and its agent regarding up-to-date owner and occupier information regarding recent changes that are yet to be reflected at the Land Registry. As indicated above, the parties remain in discussion to resolve the issue. Following a phone call with the landowner on 20 July 2026, the Applicant understands that the affected party intends to enter into a survey licence agreement to allow the surveys, avoiding the need for the Applicant to rely on its use of statutory access powers.

Party	PINS ref	Third party comment	Applicant's Response
		National Grid responded by stating that it was "not seeking to rely on that notice as valid service". In my submission, that does not address the underlying issue. The concern is not whether National Grid now accepts that the notice was invalid. Rather, it is that a defective statutory notice was issued, accompanied by site notices, and inaccurate evidence concerning those notices was subsequently presented during the examination.	
		Conclusions Taken together, these matters raise concerns regarding the use of Section 172 powers, the accuracy of National Grid's procedures and the adequacy of its engagement with affected landowners. At the previous hearing, I highlighted a separate issue concerning a legal document relating to a compound that had been overlooked. In the two months since then, I have encountered the two further examples described above. In my submission, these examples indicate a failure to follow the Government's expectations regarding engagement with affected landowners before exercising statutory powers. National Grid has repeatedly stated throughout the examination that it is engaging constructively with landowners. I respectfully invite the Examining Authority to consider whether the examples outlined above are consistent with that position. In each case, legitimate questions remained unanswered, reasonable concerns were not addressed, and statutory powers were either threatened or exercised before those matters had been resolved. My concern extends beyond the events that have already occurred. If these are the experiences of affected landowners before development consent has been granted, there is a legitimate concern that the imbalance of power will increase further if the Order is made. I therefore respectfully request that the Examining Authority carefully considers whether National Grid's conduct towards affected landowners reflects the standards of fairness, engagement and negotiation expected by Government policy and guidance when exercising statutory powers.	In line with guidance, the Applicant is committed to engaging with landowners to secure voluntary access to land in order to carry out surveys where possible. The Applicant continues to engage with the affected party and its agent. The Applicant has re-issued the requested survey licence to the affected party, which the affected party indicated on 20 July that it will sign this week. The Applicant continues to liaise with the affected party and its agents to ensure that it has complete and up-to-date ownership information for the affected party's holdings. The Applicant will continue to engage with the affected party and its agents on other matters relevant to the application. In respect of the compound issue the AP raises the Applicant believes this is a legacy issue that has now been resolved. If the AP has any further comments to make on the matter the Applicant proposes this is picked up and solutions agreed during the ongoing discussions between the AP and the Applicant.
		Cricket Bat Willow National Grid has confirmed that it is reviewing the evidence I submitted regarding the cricket bat willow plantations and the impact that the proposed pylons would have on views from Langleys. I am concerned that National Grid's response may not be available before this submission deadline. If that is the case, I will	The IP's concerns regarding the results of the harvesting of the cricket bat willows has been addressed by the Applicant in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]. It is appreciated that the Langleys Cricket Bat Willows are present for a number of years and are then removed for commercial purposes. Their removal would not / does not alter the significance of effects assessed and presented within the Environmental Statement. The assessment considers effects on views from agreed viewpoints, on Visual Receptor

Party	PINS ref	Third party comment	Applicant's Response
		have no opportunity to review or verify the accuracy of its assessment before the close of this stage of the examination. I therefore respectfully request that, if National Grid submits further evidence on this matter after this deadline, I am given an opportunity to respond.	Areas and on Landscape Character Areas. The historic environment assessment is informed by views from agreed viewpoints to aid understanding of how the Project would change the setting of heritage assets. Although the removal of Cricket Bat Willows would reduce vegetation cover in places this is because views would still be filtered by other intervening, existing trees (albeit less filtered in some locations) and therefore the conclusions would remain valid.
		Landscape Visualisations National Grid has recently published updated landscape visualisations. In my submission, these images provide limited assistance in assessing the true visual impact of the proposed development. The visualisations continue to show the low-height pylons but provide very little surrounding context. They contain no meaningful backdrop, such as mature trees, woodland or existing landscape features, against which the height and scale of the pylons can be judged. As a result, it is extremely difficult to appreciate their true visual impact. In addition, several plans submitted at Deadline 5 appear to show a mixture of standard-height and low-height pylons. This has created considerable confusion regarding the infrastructure that is actually proposed at individual locations. That confusion has been compounded by correspondence issued by National Grid after 10 June 2026 which referred to incorrect pylon heights. Given that pylon height is a fundamental consideration in assessing both landscape and heritage impacts, it is essential that all plans, visualisations and correspondence consistently reflect the proposal that is actually before the Examining Authority. The current inconsistencies make it unnecessarily difficult for affected landowners and the Examining Authority to understand precisely what is proposed. Following the Compulsory Acquisition Hearing, I have attached a copy of the Heads of Terms for the planners to review. Unfortunately, these Heads of Terms are incorrect. Despite informing National Grid at the Compulsory Acquisition Hearing of the correct land ownership structure, discussing the issue again at two subsequent meetings, and providing annotated maps by email, National Grid has still been unable to amend the Heads of Terms to reflect the correct ownership.	A response relating to the updated visualisations was provided in document 8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]. The wireline image presented provides information about landform and scale and is intended to support experienced assessors in the Residential Visual Amenity Assessment, alongside site survey and desktop research. Photomontages which include the surrounding context, are provided in the Environmental Statement in support of the assessment of effects resulting from the Project. For additional context, historic environment visualisation HE16 is taken from a similar location showing the low height pylons, and can be referenced in document 7.12 - Visualisations - Part 8 of 9 [APP-350] at Figure 7.12.F223 and Figure 7.12.F224. The increase back to standard height pylons, and the reduction from three low height pylons to two standard height pylons, have been considered through sensitivity testing. Page 33 of document 8.4.15 Applicant's comments on Responses to ExQ2 [REP6-115] sets out further information about sensitivity testing. A meeting was held onsite with the AP, the Applicant, the Applicant's representative and the APs representative. Licences and Heads of Terms were discussed. Conversation has been ongoing with the agent for the AP regarding the Heads of Terms, most recently being the re-issue of V3 in template form to the agent on 13th July 2026. At the latest meeting held on 9 July 2026, the Applicant confirmed the design detail with the AP and confirmed that this had been advised to the ExA. The arrangement being progressed is that to the north of the River Chelmer there will be four low height lattice pylons and to the south of the River Chelmer the three low height lattice pylons would be replaced by two standard lattice pylons. This requires the pylon immediately south of the river to move slightly (to around 75m from the river) and the next pylon moves to around 110m to the west of Chelmsford Road.

5. Comments on Summaries of Oral Case from ISH3

5.1 Comments on the Oral Cases from ISH3 (23 June 2026): Agenda Item 5, Articles and Schedules of the draft DCO

Table 5.1 Item 5: Articles and Schedules of the draft DCO

Item No.	Third Party Comment	Applicant’s Response
5.1 Articles and Schedules of the draft DCO		
5.1	Suffolk County Council [REP6-166] Use of the term ‘unreasonably withheld or delayed’ The use of the term has implications for discharging authorities whereby it could be determined they are committing a criminal offence. By section 161(1)(b) of the Planning Act 2008 it is an offence, without reasonable excuse, for a person to fail to comply with the terms of a Development Consent Order (DCO). By section 161(4)(a) a person guilty of an offence under section 161 is liable, on summary conviction, to a fine not exceeding £50,000. It is not considered reasonable for these words to be included in the Order. There is not a need for an additional criminal sanction to regulate local authority behaviour and the Council is unaware of evidence of dilatory behaviour by local authorities in dealing with applications for consent arising from DCOs. Local authorities understand there is a public interest in expeditious decision making and their good sense and understanding can be relied on. Secondly, since the relevant local planning authority would be responsible for enforcement, this could potentially result in a convoluted situation where the authority has to prosecute itself or prosecute another local authority for the way in which it has gone about discharging consents and requirements. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.1a.
	Article 10 (Planning permissions and other consents) The only point to note is a slight difference in the drafting of the equivalent provision in the Sea Link DCO which came about because that Order come into the Planning Act regime via a Section 35 direction, thus necessitating slightly different wording to describe the Project. The Applicant is aware of that and so the wording used in the Sea Link provision does not need to be followed here. Consistency in the drafting of Article 10 between Norwich to Tilbury and Sea Link is appropriate. The Council understands that paragraph (4) of Article 10 (planning permission and other consents) of the Sea Link draft DCO will be included in the next version of the draft Norwich to Tilbury Order. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.1b. 3.1 Draft DCO [REP6-030] submitted at Deadline 6 introduced this update.
	Part 5 The Council have looked at some DCOs made in 2025 and 2026 and identified two commonplace definitions of ‘Order land’, which are slightly different from that proposed in previous Council responses. The details have been shared and the Council will consider the Applicant’s comments in due course. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.11 Applicant’s Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.1c.

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	Article 48 During the hearing, the Applicant explained that Article 48 should refer to requirement 14 and that this will be updated at Deadline 6. The Council will consider the amended drafting in due course.	The Applicant provided comments on this in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.1d. 3.1 Draft DCO [REP6-030] submitted at Deadline 6 introduced this update.
	Article 50 During the hearing, the Applicant explained that it agreed with the point being made by the Examining Authority and that the Applicant will update the drafting of Article 50 at Deadline 6. The Council will consider the amended drafting in due course. The Council have raised wider points regarding Article 50 in its Comments on Submissions received at Deadline 3 [REP4-335] (paragraph 2.3: page 10 of 100) and its Post-hearing submission for Issue Specific Hearing 2 [REP4-336] (page 15 of 43). The Council maintains its position as set out in those documents.	The Applicant provided comments on this in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.1e. 3.1 Draft DCO [REP6-030] submitted at Deadline 6 introduced this update. The Applicant maintains its position in response to comments previously raised by SCC and set out in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192].
	Schedule 16 Protective Provisions Suffolk, Essex and Norfolk County Councils are seeking to agree between them an amended form of the highways Protective Provisions, which have been included in the draft Order. The agreed text has been sent to the Applicant and their comments are awaited. With regard to Section 23 of the Land Drainage Act 1991 (LDA 1991), under Section 150 of the Planning Act 2008 there is a mechanism for including certain additional prescribed consents and authorisations within a DCO, where the 'relevant body' that would otherwise be required to grant the prescribed consent or authorisation has consented to the inclusion. Section 23 of the LDA 1991 can therefore be disapplied, provided the relevant drainage authority has consented to that disapplication. Agreed Protective Provisions would provide a consenting regime instead. However, such consent is not likely based on the current drafting of the Protective Provision for the drainage authorities. One of the main differences between the regime for determining applications under Section 23 of the LDA 1991 and under Protective Provisions is that the deadlines for determination under the Protective Provisions are usually shorter. This is a concern and the Applicant has been urged to modify this approach otherwise the authorities will not agree to the disapplication of Section 23. Updated Protective Provisions have been shared by the Applicant and these are currently being considered. [Applicant note: this submission has been summarised]	LEGAL
5.1	Norfolk County Council [REP6-157] Use of the term 'unreasonably withheld or delayed' Delivery of the authorised development should not be held up unreasonably. If deemed consent provisions are included, then the Council considers the requirement for consent not to be 'unreasonably withheld or delayed' is redundant. Besides which, the Council is already prevented from making decisions in an 'unreasonable' way by the ordinary principles of public law. However, its redundancy means that it is not particularly objectionable. [Applicant note: this submission has been summarised]	Noted.
	Schedule 16 Protective Provisions The Protective Provisions for the protection of drainage and flood authorities (in part 3) and for the protection of the highway authorities (in part 4) have not agreed with the Council.	The Applicant and Norfolk County Council have agreed protective provisions in favour of the flood authorities. These are included in the 3.1 Draft DCO (Revision G) submitted at Deadline 7.

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	In the case of the flood authority provisions, it is considered more appropriate to use the existing statutory regime under Section 23 of the Land Drainage Act 1991. Under Section 150 of the Planning Act 2008, the Council's consent is needed to remove the requirement for consent included in Section 23 of the Land Drainage Act 1991. Sufficient progress has not been made on the significant outstanding drainage issues therefore consent is not given for the disapplication of Section 23 of the Land Drainage Act 1991 and the need for Protective Provisions falls away. Discussions with the Applicant relating to Protective Provisions are ongoing. In relation to the highway authority Protective Provisions, the local highways authorities are negotiating with the Applicant on a 'twin-track' basis, with Suffolk County Council and Norfolk County Council working on Protective Provisions and Essex County Council and Thurrock Council working on a Framework Highways Agreement. Either legal form is acceptable. [Applicant note: this submission has been summarised]	
	Requirements related to: i) Management Plans and Commitments ii) Management Plans to be approved iii) Mitigation of intra-project cumulative effects iv) The provision of as built details to relevant local authorities A construction surface water management plan should be secured by a new requirement or added as a relevant plan under Requirement 4 (Construction Management Plans). Currently, the Applicant suggests that the Outline Code of Construction Practice requires the production of a surface water management plan. However, the Council are not content with this because the drainage strategy (with which the surface water management plan must be substantially in accordance) is not suitable in its present form. [Applicant note: this submission has been summarised]	Please refer to the Applicant's comments in 8.30 Response to Rule 17 Letter received 30 June 2026 [REP6-132]. The Applicant submitted a revised 8.2 Drainage Strategy [REP6-095 – REP6-098] at Deadline 6. Its position is that this, together with Commitment GG22, is sufficient to secure a suitable surface water management plan.
5.2 Schedules 3 and 4 of the draft DCO (Requirements and discharge of requirements)		
5.2	Babergh and Mid Suffolk District Council [REP6-136] The Councils have experience on comparable projects, including Bramford to Twinstead, where a number of iterations of approved documents have arisen. The Councils stressed the importance of maintaining a full and clear library of the documents that are approved and relied upon, with access granted as quickly and easily as possible, so that an iterative dialogue can be maintained with the developer throughout delivery. This would allow non-compliance to be managed as a continuous process rather than dealt with reactively. The Councils consider that the potential for inconsistency and lack of responsiveness, where there is scope to pick and choose between documents, represents a real risk, and one that is likely to build in delay later in the process. [Applicant note: this submission has been summarised]	Please see the response to DCO 2.S16 in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP-6-115] and Schedule 3: Add a register of requirements in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
5.2	Suffolk County Council [REP6-166] Schedule 3 (Requirements) With regard to the exclusion of pre-commencement operations from the need for any archaeological evaluation or investigation, it is considered that the same degree of safeguarding is needed as proposed in the Sea Link Examination. This is to ensure that the pre-commencement works are the subject of some prior evaluation or investigation, in order to ensure that something is not irretrievably damaged that ought not to be irretrievably damaged. Both Norwich to Tilbury and Sealink are within parts of	The Applicant provided comments on this in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] in item 5.2a.

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	Suffolk with similar below ground sensitivity therefore the same degree of safeguarding is needed. [Applicant note: this submission has been summarised] Post-hearing note: 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. The Council's comments/ suggested wording for requirement 5 (archaeology) is as follows: “(1) <u>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</u>, 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.” “(2) <u>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 England.</u>”With these amendments, Paragraph (3) could be removed. “(6(a)) No later than two years following <u>completion of construction</u>, 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.” (6(a)) 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. - Paragraph (7) should be removed, as the matters it seeks to address would be properly controlled through the Council's amended Paragraphs (1) and (2). As currently drafted, Paragraph (7) is not acceptable because it creates a circular and potentially ineffective control mechanism. Mitigation for all works, including pre-commencement operations, must be determined in advance following archaeological evaluation and implemented in accordance with a detailed Written	Requirement 5(1) was added at the request of the Councils to clarify that all evaluation works must be carried out in accordance with a written scheme of investigation. It formalises the position that has been followed, and agreed with the relevant stakeholders, for all evaluation works to date. It is not necessary or appropriate to link this to the commencement of the authorised development. The Applicant's position remains unchanged regarding the inclusion of a blanket prohibition on any activity that requires, to any degree, an element of ground intrusive works. The Applicant's position was set out at Issue Specific Hearing 3 and is summarised in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117] and so it does not repeat that here. The Applicant disagrees with SCC's suggested amendment to requirement 5(6)(b). However, in order to prevent the post-excavation process being unnecessarily lengthened 5(6)(b) has been updated to state “no later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design must be submitted to, and approved by, the relevant planning authority...”. The current trigger for this requirement (two years following the approval of the final site-specific post excavation assessment) is appropriate as the events are set out in a logical sequence – it requires the post excavation assessment to be approved before the updated project design is submitted for approval. The principle of the trigger aligns with the principle adopted in the draft Sea Link Order. Likewise, the sentence proposed to be deleted by SCC is contained in the draft Sea Link Order and it is unclear why SCC seeks its removal. The Applicant maintains its position that the measures set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C], the extensive evaluation works already carried out, commitment GG04 in 7.2 Outline Code of Construction Practice [Revision G] requiring a clerk of works to be present during works, and the different archaeological context to that on the proposed Sea Link project, together mean that it is entirely appropriate and proportionate for this CNP project to carry out its pre-commencement operations in accordance with the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C].

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	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. [Applicant note: this submission has been summarised]	
	Relevant local authorities and other relevant interested parties will be asked for their views on the applicant's proposed approach It was agreed that the Applicant would include its proposed provision at Deadline 6, allowing the local authorities to comment on it at Deadline 7.	The Applicant included its proposed DESNZ drafting in the 3.1 Draft DCO [REP6-030] at Deadline 6.
	Schedule 4 (Discharge of Requirements) It would not be helpful to the objective of the Fingleton review for all discharge of requirements to be left to the new unit Suffolk County Council are concerned by the prospect of an applicant – not necessarily the Applicant, but any applicant – choosing who to apply to for discharge, because this would be inappropriate. An answer would be to have a mirror of calling-in powers that exists under Section 77 of the Town and Country Planning Act 1990. Requirements would be discharged at the local level by the relevant local authority, but the Secretary of State would have the power to defer this to the Secretary of State. The preferred default position is having the requirement discharged by the local planning authority. Similar wording of a suggested provision was put forward during the Sea Link examination. If a hybrid approach is not adopted, it would be critical to build in proper arrangements for not only consultation with the local authorities (with set timelines that they're allowed for consultation responses) but also a requirement for the applicant to then reflect upon those consultation responses in the application. It was explained there is a useful precedent for such a provision in requirement 23 (details of consultation) of the A122 (Lower Thames Crossing) Development Consent Order 2025 (SI 2025/462). [Applicant note: this submission has been summarised]	The Applicant's position is that it is important to allow DESNZ the space to design and establish its Post-Consent Unit without pre-empting its operational framework through prescriptive drafting in the draft DCO on call-in, consultation procedures or similar. The Applicant has set out its response regarding the proposal for a 'call in' mechanism in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]. The Government has accepted Recommendation 30 of the Fingleton Review and committed to establishing the Unit and deliver post-consent discharge functions in consultation with Local Authority Planning Departments, which will speed up decisions on the meeting of post-consent requirements. DESNZ has shared a road map envisaging stakeholder engagement through to Autumn 2026 and full operation by January 2027. Introducing detailed mechanisms into the draft DCO at this stage risks constraining how the Unit can operate before it even exists, potentially undermining the very efficiency gains it is intended to deliver. Crucially, the Applicant's proposed drafting already safeguards the role of local authorities: the DESNZ Unit is not made an automatic default, and local planning authorities would be consulted whenever the Unit acts as the responsible body, therefore preserving local expertise and community accountability in the discharge process. Planning Performance Agreements would also remain to support both future approvals and any consultation arising from DESNZ's involvement. The Applicant therefore considers that the most appropriate course is to retain the flexible framework it submitted at Deadline 5 and its further response at Deadline 6, which enables the Order to adopt whatever structure the Government directs while ensuring that local authority input remains embedded in the consultation process.
5.4 Consents, licences and other agreements		
5.4	Suffolk County Council [REP6-166] Post-hearing note: Suffolk County Council and the Applicant have largely agreed the content of a Section 106 agreement, which seeks to address the duty, pursuant to Section 245 of Levelling-up and Regeneration Act 2023 and Section 85 of Countryside and Rights of Way Act 2000, to seek to further the purposes of the Dedham Vale National Landscape. Under the agreement, the Applicant will not commence the authorised development within the Dedham Vale National Landscape until a Compensation Fund – of slightly more than £2.4m – has been paid to Suffolk County Council. Suffolk County Council will hold the Fund as agent on behalf of Dedham Vale National Landscape and Stour Valley Partnership and it must be spent in accordance with the terms of the agreement.	The Applicant and SCC have now both executed the section 106 agreement relating to the statutory duty to further the purposes and completion is anticipated shortly after Deadline 7. A copy of the executed agreement is submitted at Deadline 7 under 8.25 National Landscape - Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [Revision C].
5.4	Norfolk County Council [REP6-157] Please see discussion of highways and LLFA protective provisions at agenda item 5.1. The need for a highways agreement may be satisfied by suitable protective provisions if these can be agreed by deadline 6. Norfolk County Council will consent to the disapplication of Section 23 of the Land Drainage Act 1991 only if suitable protective provisions can be agreed.	The Applicant and Norfolk County Council have agreed protective provisions in favour of the flood authorities. These are included in the 3.1 Draft DCO (Revision G) submitted at Deadline 7.

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AOB	Lower Thames Crossing Project (LTC) [REP6-153] The primary concern relates to the significant spatial and temporal interactions between the Projects. LTC cannot comply with certain obligations and commitments under its Development Consent Order (DCO) should the Applicant's Project be consented. Drafting amendments are needed to achieve the following outcomes (drafting has been submitted to the Applicant): - To expressly record that any works carried out pursuant to the Norwich to Tilbury 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 - To expressly modify the terms of Schedule 2 (Requirements) to the LTC DCO in order to allow LTC greater flexibility when discharging certain Requirements, specifically requirement 5 in relation to Landscape and Ecology. The intention is to allow the Secretary of State for Transport to determine that obligations or 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 Norwich to Tilbury. [Applicant note: this submission has been summarised]	The Applicant acknowledges that the construction of Norwich to Tilbury would render LTC's compliance with certain ecological commitments under the LTC more difficult or, on occasion, impossible. 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. Accordingly, the Applicant's proposed amendments to 3.1 Draft DCO [REP6-030] submitted at Deadline 6, and further updated at Deadline 7 (3.1 Draft DCO [Revision G]) to respond to submissions made by the LTC Undertaker at Deadline 6 [REP6-153], are intended to facilitate the following outcomes: - To expressly record the fact that any works carried out pursuant to the Draft 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 Draft DCO, both parties consider and agree that an express provision (included at Article 59(6)) is necessary (and precedented). - To expressly modify, through the incorporation of an agreed form of wording at Article 59(7), the terms of Schedule 2 (Requirements) to 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 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 the Project so that there is no serious detriment to the LTC Undertaker.
	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, leaving only 5 hectares unaffected. In addition, there are a number of environmental commitments secured by Requirement 5 of Schedule 2 to the LTC DCO that cannot be delivered: - 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 - A bat barn in the northern extent of the Hoford Road ancient woodland replacement site - General habitat connectivity between existing habitats - Ancient woodland compensation planting - Woodland planting between Hoford Road and Brentwood Road - Retention of a vista in the N-dep compensatory habitat Drafting amendments are needed to achieve the following outcomes (drafting has been submitted to the Applicant): - Refer to point 1 and 2 in the row above - To expressly relieve LTC from the obligation in the LTC DCO to deliver the 16 hectares of N-dep compensatory habitat creation on parcels of land which fall within the Norwich to Tilbury Order Limits and which therefore prevent or create uncertainty over when that habitat creation can take place. LTC's DCO commitments would be delivery of 5 hectares of N-Dep compensatory habitat creation at Hoford Road. The Applicant would be expressly committed to carrying	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, impossible. 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. Accordingly, the Applicant's proposed amendments to 3.1 Draft DCO [REP6-030] submitted at Deadline 6, and further updated at Deadline 7 (3.1 Draft DCO [Revision G]) to respond to submissions made by the LTC Undertaker at Deadline 6 [REP6-153], are intended to facilitate the following outcomes: - To expressly record the fact that any works carried out pursuant to the Draft 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 Draft DCO, both parties consider and agree that an express provision (included at Article 59(6)) is necessary (and precedented). - To expressly modify, through the incorporation of an agreed form of wording at Article 59(7), the terms of Schedule 2 (Requirements) to 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 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 the Project so that there is no serious detriment to the LTC Undertaker. - To allow LTC or the Applicant to undertake replacement or alternative compensatory planting and environmental mitigation on parcels of land intended to be secured by the Applicant within the Order limits for the Project. This is expected to be achieved by making LTC a direct beneficiary of powers under the Draft DCO for a very limited purpose (similar, in effect, to the mechanism through which UKOP would be authorised to carry out the existing Work No. 17A). A new Work No. 20 has been

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	out the establishment of equivalent alternative compensatory habitat 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. To expressly relieve LTC from the obligation in the LTC DCO to deliver the environmental commitments set out above. As the Applicant's scheme significantly conflicts with LTC's environmental proposals, it is considered that it should be the Applicant's responsibility to identify and secure alternative compensatory habitat land within its Order Limits and establish compensatory habitats within those plots equivalent to those which would be provided by the LTC DCO if orwich to Tilbury had not come forward, in order to achieve equivalent compliance with the obligations and commitments that were contained within the LTC DCO. It would place an unreasonable burden on LTC to carry out the habitat creation works due to the absence of detail provided by the Applicant at this stage in relation to the potential location of alternative sites and the timing of their availability. The coming forward of Norwich to Tilbury has created significant delivery uncertainty, the risk of abortive or delayed works, and associated costs in relation to this. Following the period of establishment of these environmental mitigation areas, which would be expected to be around five years, LTC is content to take on the ownership and long term management of the sites. LTC is pursuing a side agreement with the Applicant to document how this can be achieved. [Applicant note: this submission has been summarised]	included in Schedule 1 to the draft DCO for this purpose, with corresponding updates also made to the 2.3 Works Plans - Section H [REP6-018]. - To allow for the direct vesting of land (or rights) in LTC where powers of compulsory acquisition are exercised by the Applicant pursuant to the Draft DCO. Identical provisions are included in the LTC DCO for the benefit of, amongst others, the Applicant. - Additionally, Paragraph 6 of the Applicant's 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.

6. Comments on Summaries of Oral Case from ISH4

6.1 Comments on the Oral Cases from ISH4 (24 June 2026)

Table 6.1 Comments on the oral cases from ISH4

Item No.	Third Party Comment	Applicant's Response
5 Landscape and Visual effects		
5.1	Suffolk County Council [REP6-166] Compensation and the mitigation hierarchy The Bramford to Twinstead Development Consent Order was a case-specific judgement. Each case should be decided on its own merits. The available evidence shows that there are adverse residual impacts, particularly on landscape, heritage, and public rights of way for which there is no practical mitigation or further mitigation possible (mitigation of something which goes to reduce the actual adverse impact rather than other components of the mitigation hierarchy such as compensation). It is considered there is inconsistency in the Applicant's position on mitigation and compensation and that the proper position is in National Policy Statement (NPS) EN-1 paragraph 4.2.12, stating that the Applicant should set out how residual impact will be compensated for as far as possible. That is not written in a way which excludes landscape impacts or impacts arising from overhead powerlines. NPS EN-5 sits within the umbrella of NPS EN-1 and does not state that NPS EN-1 paragraph 4.2.12 should not apply to overhead powerlines causing landscape impacts. In relation to necessity, EN-1 paragraph 4.1.8 states '<i>necessary to make the proposed development acceptable in planning terms</i>'. It is considered that this clarifies the purpose or function of the necessary or necessity test, i.e. what you need to do to make the development acceptable in planning terms and that inevitably entails the formulation of a planning judgement about what is (and what is not) an 'acceptable' planning outcome. This will be case- and site-specific. There are residual adverse impacts as a result of the Project and those residual impacts are capable of being offset. The constraints and opportunities plans submitted highlight that there are landscape and nature conservation matters that can be meaningfully delivered within the geographic compass of the impacts. Many of them are linear in nature and relate to landscape and nature conservation measures that can be enhanced in a way that can be seen as compensating or offsetting residual impacts. [Applicant note: this submission has been summarised] Offsite planting delivery schemes Offsite planting delivery schemes are considered to be required. However, there are concerns over the mechanism for them, as there needs to be a clear commitment by the Applicant to ensure that it leads to the desired outcome, which is the replacement planting at 3:1. It should not be left as a scenario where there is a pot of money but no direction from the Applicant in terms of deliverable schemes.	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 5.1a. Please see Appendix A in this document setting out the current position in relation to the draft Article that is close to agreement with the LPAs in respect of landscape compensation. This is proposed by the Applicant on a "blue pencil" basis for the SoS to determine as indicated at ISH4. 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 5.1c. Requirement 9 of 3.1 Draft DCO [Revision G] secures details of any offsite tree planting required as a result of the 3:1 commitment through the submission of an Offsite Planting Delivery Scheme which will be approved by the relevant Local Planning Authorities. The Applicant submitted 8.28 Outline Offsite Planting

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	[Applicant note: this submission has been summarised] Monitoring Suffolk County Council's position on monitoring remains unchanged from the LIR [REP1-178]. Regarding adaptive management, the Council considers that there needs to be a period greater than 5 years and more adaptive to the particular location and conditions for the reasons referred to in the LIR. Suffolk County Council is of the view that the Applicant needs to be more flexible on its approach to this, rather than promoting a chronological cut-off.	Delivery Scheme [REP6-128] at Deadline 6, the Final Offsite Planting Delivery Scheme will be in substantial accordance with the outline version. 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 5.1q.
5.2	Joanne Elliott and Richard Davies [REP6-209] We support the two independent Landscape Assessments. The landscape of the Colne Valley is stunningly varied, which is a key part of the experience when walking the various public footpaths, including the Essex Way. It is appreciated by the public in significant numbers and is a bedrock to wellbeing and mental health. The introduction of the proposed infrastructure will completely change the nature of the Colne Valley forever. The Colne Valley is a special setting in its own right and deserves protection due to: • The valley with its meandering river • Areas of ancient woodlands • Wetland meadows and grazing pastures • Very tranquil setting • Far reaching views The valley shares many of the characteristics of the Dedham Vale and there is landscape continuity, shared cultural history and ecological habitat/wildlife corridors between the Colne Valley, Stour Valley and Dedham Vale. The continuation of the landscape is valuable to each valley/vale and its setting. Fragmenting it by introducing industrial infrastructure would be cause significant harm to the Dedham Vale itself, its setting and to the neighbouring valleys, in particular the sealing end compound at Crabtree Lane. It is frustrating that National Grid: • Maintain their position no matter what evidence is presented to the contrary. • Argue that the Colne Valley does not have National Landscape status and, in their view, would not qualify for such designation. • Do not acknowledge the many attributes that the Colne Valley shares with a designated National Landscape, which would enable this landscape to be protected. • Provide inadequate and dismissive answers. • Do not correct factual errors. The fact that the proposed overhead lines through the Colne Valley would be seen widely from the National Landscape itself is acknowledged by National Grid, but no attempt is made to avoid the harm to the National Landscape. [Applicant note: this submission has been summarised]	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 items 5.2a-d. The Applicant has also provided responses to similar points made by Villages Against Pylons in REP6-172 and by Aldham Parish Council in REP6-175. These responses are set out in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A]. The Applicant has further considered the additional points raised in writing by Pylons East Anglia (PEA) at Deadline 6. Responses to PEA comments related to natural beauty criteria are included in Appendix E of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
5.2	Little Horkesley Parish Council [REP6-151] The proposed pylon network is underground through Dedham Vale National Landscape. It is considered that the Colne Valley is equally deserving of	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 items 5.2a-f.

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	undergrounding, as it shares many features of the Dedham Vale (indicated by the independent Landscape assessments): • It is unspoilt with stunning views over a lowland valley. • There are many old houses of historic interest and there are two grade 1 listed churches. • It is largely agricultural and a pylon network would be very visible across the vale and would completely destroy the natural beauty of the location. The proposed sealing end compound at Little Horkesley is far too close to the Dedham Vale. Colne Valley, Dedham Vale and the Stour valley should be considered to be one large area of similar characteristics and beauty. As such, this area should be ‘avoided altogether’ in order to protect the whole as per the requirements of National Policy Statement EN-5. National Grid have offered some opportunities but these do not begin to mitigate the damage caused and planting hedgerows would remove the beautiful views which are such a feature of the valley. It is considered that any network through the Colne valley should be underground. [Applicant note: this submission has been summarised]	The Applicant has also provided an expanded response to similar comments made in REP6-209 above, cross referencing responses to Villages Against Pylons, Aldham Parish Council and Pylons East Anglia included in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
5.2	Aldham Parish Council [REP6-175] Colne Valley Landscape – Fordham/Fordstreet, Aldham The three independent Landscape Reports assert that the Project has ‘<i>high potential for widespread and significant harm</i>’ in the Colne Valley. Pylons TB54 and TB55 are in extreme proximity to residential properties in Green Lane and Hines Close, Aldham. The further unaccompanied site visits to Aldham are welcomed. While the Colne Valley is not a National Landscape, it is considered to share many of the Natural England criteria: • 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. The Ofgem-backed National Grid Visual Impact Provision Project (VIP) is ‘<i>to reduce visual impacts of electricity infrastructure in protected landscapes</i>’. OHLs have been removed and replaced by underground cables in Snowdonia, Peak District, Cotswolds and Dorset. [Applicant note: this submission has been summarised]	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 items 5.2a-f. The Applicant has also provided an expanded response to similar comments made in REP6-209 above, cross referencing responses to Villages Against Pylons, Aldham Parish Council and Pylons East Anglia included in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
5.3	Suffolk County Council [REP6-166] The visualisations demonstrate that if full use was made of the Limits of Deviation (LoD), landscape and visual effects would in sensitive locations be considerably worse than has been shown in the earlier visualisations or by the locations for the pylons as shown on the Works Plans.	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 5.3a. Please also see the Applicant's response to Action Point 6 and 7 in Section 2.2 of this document, and Action Point 7 in Section 3.4 of this document.

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	An example is the Angles Way in the Waveney Valley in regard to pylons RG86 and RG87 where the LoD along the promoted route could have increased adverse effects on existing trees and the hedgerow along the PRow, as well as on the PRow itself. This is contrasted by the differences in the Gipping Valley which appear to be less pronounced. It is considered there are several locations where there is a need for micro-siting, where either the extent of the LoD should be reduced to a narrower range or in some cases the details of the pylon location and its height should be fully assessed and agreed with the relevant local authority. The Council does not consider that the worst case has been assessed in relation to landscape and heritage effects. [Applicant note: this submission has been summarised]	
	GG34 does not go far enough in restricting the LoD in sensitive areas and it does not address all of the sensitive locations. [Applicant note: this submission has been summarised]	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 5.3b. Please also see the Applicant's response to Action Point 6 and 7 in Section 2.2 of this document, and Action Point 7 in Section 3.4 of this document.
	GG34 includes caveats about minimising and restricting the location of pylons 'as far as practicable' or 'if reasonably practicable'. There is also no approval mechanism. It is considered there needs to be an approval mechanism for the micro-siting of pylons in sensitive locations to ensure that impacts are minimised and that this should be agreed with the relevant local authority. [Applicant note: this submission has been summarised]	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 5.3f. Please also see the Applicant's response to Action Point 6 and 7 in Section 2.2 of this document, and Action Point 7 in Section 3.4 of this document.
5.3	Braintree District Council [REP6-139] The updated wireline visualisations for Residential Visual Amenity Assessment (RVAA) receptors E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm) now reflect the lateral deviation element of the Limit of Deviation (LOD) but not the potential for pylon locations to move longitudinally. This could result in pylons being positioned closer to these properties than shown in the submitted visualisations, further exacerbating effects at receptors E7 and E8. The visualisations further reinforce concerns regarding effects on receptors E7 and E8 and that the proposed towers would appear both "unpleasantly encroaching" and "inescapably dominant" from these properties, two of the criteria identified within the Applicant's RVAA methodology as indicators that the threshold for a breach of residential visual amenity may be reached. Commitment GG34 within the Code of Construction Practice (CoCP) should be amended to fix the route alignment in the vicinity of receptors E7 and E8. For receptor E7, this would require towers TB93 and TB94 to be fixed. For receptor E8, this would require towers TB97 and TB98 to be fixed. This would provide greater certainty and reduce the potential for visual impacts to worsen through the exercise of the authorised LOD. Clarification is also sought on the approach to the RVAA and whether the Applicant considers that a residential receptor would need to be surrounded by development on all sides, or experience effects from multiple directions, before a breach of residential visual amenity could occur. It is considered that significant visual effects could be experienced as unpleasantly encroaching, overbearing or inescapably dominant from principal views or key areas of a property, even where those effects are not experienced in all directions.	The Applicant set out its position in respect of the updated wireline visualisations for Residential Visual Amenity Assessment (RVAA) 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 [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 [REP5-126]. The Applicant set out its position in respect of a potential breach of the Residential Visual Amenity Threshold (RVAT) 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 [REP6-118]. Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Final Issue C [REP5-126] to [REP5-135] recognised that the Project would cause a high magnitude of visual effect for receptors E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm), including should such movement of the Project in the LoD occur. The assessment found that it would not be so harmful that it would 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 become one of public interest (rather than just an impact upon a private view). Therefore, it is considered that there is no reasonable cause to restrict the LoD in these areas Document: 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Final Issue C [REP5-126] to [REP5-135] sets out at paragraphs 13.2.24 to 13.2.26 the approach to judgements upon the Residential Visual Amenity Threshold. The Applicant maintains that the findings of the Step 2, 3 and 4 assessments within the current RVAA are valid as these have been

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	[Applicant note: this submission has been summarised]	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.
5.4	Suffolk County Council [REP6-166] Suffolk County Council maintains its position that link pillars should be embedded into their surroundings with appropriate screen planting. This also outlines the proposed requirement that the Council would wish to see included in the Development Consent Order. Suffolk County Council are not seeking to control the siting of link pillars but where they are operationally required then there would be control of the above ground appearance. [Applicant note: this submission has been summarised]	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 5.4a and 5.4b.
5.4	Joanne Elliott and Richard Davies [REP6-209] The Environmental Reports lodged by National Grid in June state that they have considered all properties where the property itself or its curtilage is within 200m of the proposed overhead line. The original curtilage of Highfields Farmhouse (ref 1225094, a grade II listed building), including the end of the driveway, is within 200m of the proposed line. The adjoining land, which includes grazing land and part of the garden and forms an integral part of the property amenity, is within about 30m of the overhead line. This garden, with a summerhouse and dining/seating area will be overshadowed by the line. However, Highfields Farmhouse is not included in the Environmental Reports and it is considered it should be due to being a listed property that is severely affected. It should be noted that Highfield Farmhouse and neighbouring listed houses Coney Byes, Kings Hall and Fordham Place were all included in National Grid's Preliminary Environmental Information Report as properties within 200m of the draft Order Limits. The qualifying parameters for inclusion in the Environmental Reports have changed from (the curtilage) being within 200m of the draft Order Limits to within 200m of the proposed line. The number of properties severely impacted by this Project appear vastly understated. In assessing which properties to include, the topography and landscape have not been considered, relative positioning/height/dominance of the infrastructure on the surrounding landscape (the positioning of the pylons, and their structure) or the approach to residential properties can make a difference to impact so broad brush distances cannot be imposed. This appears to have been a desktop exercise with a ruler and strict cut off with no understanding of the actual landscape. The sealing end compound TB34/35 all the way to TB44 will be visible from Highfields Farmhouse and pylons will be visible from almost every window in the house and will dominate some views, including the skyline on two sides of the property. The property/ driveway entrance will be dominated by pylon TB40 opposite, which will be a substantial pylon due to the change in angle of the line. The approaches to the property on the road from both directions, will be dominated by pylons and overhead wires. The assessment of visual effects from Highfields Farmhouse is therefore considered to be understated and there are factual inaccuracies included in the Applicant's description, including the number and visibility of pylons and overhead wires etc. Visuals shown to us by National Grid show very clearly that the whole line of pylons on two sides of the property and the sealing end compound at	The impact of the Project on Highfields Farmhouse (1225094) 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 Heritage Assets [Revision B], and 6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]. The setting of Highfields Farm (1225094) has also been considered in 8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089] (pp. 583-584, 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 Highfields Farmhouse is not considered in 6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]. Highfields Farmhouse is 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 (construction)/permanent (operation (and maintenance)) minor adverse residual significance of effect, which is not significant, due to changes in its setting that affect its value. The Applicant disagrees that there are inaccuracies in the assessment of the setting of Highfields Farmhouse. The assessment work noted above identifies three pylons (TB38 to TB40) within the setting of Highfield Farmhouse, and the applicant is confident in the conclusion. The Applicant acknowledges that other elements of the Project may be visible from Highfields Farmhouse, but wires, pylons and other infrastructure to the north and south of pylons TB38 to TB40 lie beyond the bounds of the setting of Highfields Farmhouse. This is because the setting of a heritage asset does not equate directly to the viewshed of the asset. 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) provided by Deadline 7. This Document: 6.13.1.A4 Environmental Statement Appendix 13.4.1 – Addendum to the Residential Visual Amenity Assessment Final Issue A 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 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.

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	Crabtree Lane would be visible. National Grid's document 7.12 Visualisations also showed how the pylons run alongside the property and dominate the setting. [Applicant note: this submission has been summarised]	
AOB	Babergh and Mid Suffolk District Councils [REP6-136] The matters under discussion in relation to the section 106 agreement that are relevant to Babergh and Mid Suffolk include mitigation for the Waveney Valley, the Dedham Vale, and the Bramford substation, and that these comprise a number of distinct mitigation items of equal value to the communities, environment, and landscape of those areas. This is of particular importance around the Bramford substation, where there is a high likelihood of reasonably foreseeable significant development; the Applicant itself acknowledges in the 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] that it has yet to assess the impacts of the alchemy and battery developments coming forward in that area. The Councils consider that the communities and environments in that area are already significantly impacted and are likely to be affected significantly further. The Councils emphasised the importance of fulfilling their role in securing the most optimum, effective, and efficient mitigation for all of these areas, and confirmed they will continue discussions with the Applicant on this basis. The Councils noted a reservation that landscape mitigation may be overtaken by the policy basis for decision-making, and raised a further concern as to what would happen if a mutually agreed position is not reached within an appropriate timeframe. [Applicant note: this submission has been summarised]	The Applicant has set out the latest position on progression of a draft Article in the DCO dealing with the provision of landscape compensation, enhancement and offsetting at paragraph 6.2(b) of 8.31 Response to Rule 17 Letter Received on 14 July 2026.
6 Noise and vibration		
6.1	Tendring District Council [REP6-168] The Applicant did not provide any substantive update regarding the magnitude of noise and vibration impacts on noise-sensitive receptors, nor any clear update on the specific mitigation measures proposed to address those impacts. The concern remains that there is no property-specific or location-specific mitigation strategy identified for those residential properties identified as being amongst the most severely affected by construction traffic impacts. In particular, any detailed mitigation proposals for the significant noise and vibration effects arising from National Grid's proposed use of Bentley Road as Primary Access Route 30. Any mitigation relied upon by the Applicant must be specific, effective, enforceable and capable of proper scrutiny during the Examination. Known, necessary and material mitigation measures for known significant effects should not be deferred to the post-consent discharge of requirements stage. The Nationally Significant Infrastructure Project (NSIP) process is intentionally front-loaded to ensure the Examining Authority and decision-maker have sufficient information to understand the likely impacts of a proposal and the effectiveness of proposed mitigation. The Applicant's position remains vague and lacking in sufficient detail, which is concerning when the impacts arising from the proposed siting of the East Anglia Connection Node and the resulting use of Bentley Road as a principal construction route have been known throughout the Project's development. National Grid should already know:	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 6.1.

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	• The scale of noise and vibration impacts arising from all project-related traffic using Bentley Road • The number and location of affected residential properties • The specific mitigation measures required to reduce those impacts to acceptable levels If the impacts and affected receptors are known, it follows that the mitigation required to address those impacts should also be capable of being identified. Conversely, if the Applicant does not yet understand the scale of impacts or the mitigation required for Bentley Road, that would itself be very deeply concerning. [Applicant note: this submission has been summarised]	
	If mitigation of known impacts is deferred until after the Development Consent Order decision, this is considered to be an unsatisfactory position as: • The Examining Authority cannot confidently assess the residual effects on residential amenity (and human health) because the nature and extent of mitigation remain unknown • Affected communities cannot properly understand what mitigation, if any, will ultimately be delivered • The effectiveness of future mitigation cannot be scrutinised and therefore it is not clear whether significant adverse effects can in fact be reduced to acceptable levels • Tendring District Council still do not understand the latest arrangement for the potential sharing of haul routes with the two wind farms. [Applicant note: this submission has been summarised]	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 6.1.
	A concern remains over timing, in that any mitigation proposed for residential properties will be undertaken as part of the discharge of requirements, which typically occurs close to the commencement of construction. Residents will therefore not know what mitigation is proposed until shortly before construction begins, resulting in uncertainty and reduced opportunities for meaningful engagement and influence over the measures ultimately proposed. The bespoke noise mitigation strategy for Jasmine Cottage is welcomed. However, it is not clear why equivalent property-specific assessments and mitigation strategies cannot be prepared for every residential property on Bentley Road that is predicted to experience significant adverse noise or vibration effects in the absence of mitigation. This is particularly pertinent because Jasmine Cottage has been unoccupied for a number of years, whereas existing residents of Bentley Road will be directly exposed to the impacts identified in the Applicant's assessments and are entitled to certainty regarding how those impacts will be addressed. Detailed, bespoke, property-specific mitigation proposals for all significantly affected properties on Bentley Road should be developed now and presented during the Examination before it closes, so that affected residents have the opportunity to challenge or influence the proposed measures. [Applicant note: this submission has been summarised]	The Applicant acknowledges Tendring District Council's comments. However, it is entirely normal and appropriate for the detailed design of mitigation measures to be undertaken post-consent. The relevant commitments within 7.2 Outline Code of Construction Practice [Revision G] secure the requirement for detailed construction noise assessments and the implementation of any necessary mitigation measures, with the associated Noise and Vibration Management Plan (NVMP) to be agreed with the relevant local planning authority prior to the commencement of the relevant works. The Applicant does not agree that Jasmine Cottage is being treated differently from other affected receptors. The commitment relating to Jasmine Cottage reflects the Applicant's conclusion that standard mitigation measures are unlikely to be feasible or sufficient in this specific instance and therefore that a bespoke mitigation strategy is required from the outset. The same approach would apply to any other property along Bentley Road where detailed assessment demonstrates that standard mitigation measures are not feasible or would not achieve the required outcome. In such circumstances, bespoke mitigation measures would be developed and implemented as necessary. The distinction is therefore not between Jasmine Cottage and other properties, but between locations where standard mitigation measures are appropriate and locations where a bespoke solution is required. The Applicant therefore does not agree that property-specific mitigation strategies need to be prepared for all affected properties at this stage. The purpose of the commitments is to secure the outcome - namely that significant adverse effects are avoided through the implementation of appropriate mitigation—while allowing the detailed design process to identify the most effective and proportionate mitigation measures for each location. This approach is consistent with standard industry practice and provides an appropriate degree of flexibility whilst ensuring that mitigation measures are agreed with the relevant local planning authority before the commencement of the works.

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6.3	Braintree District Council [REP6-139] The Council has reviewed the latest 7.2 Outline Code of Construction Practice [REP5-139] (CoCP) and the 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP4-170] (NVMP). Strengthened commitments have been proposed for the Main Works Contractor (MWC) to prepare detailed noise and vibration assessments and mitigation measures once the design and construction methodology are more fully developed. The Council accepts in principle that the preparation of detailed noise and vibration assessments by the MWC is an appropriate approach. However, the Council considers that NV05 should be amended to ensure consistency with Requirement 4 and to secure the submission of those assessments and any associated mitigation measures to the relevant Local Planning Authority for approval prior to the commencement of the relevant works. As currently drafted, NV05 relies upon the MWC identifying where there is potential for significant noise and vibration effects and does not provide a clear mechanism for independent review or approval by the Local Planning Authority. The Council is concerned that this places sole reliance on the contractor's assessment and limits the LPA's ability to exercise effective oversight of the identification, assessment and mitigation of impacts on Noise Sensitive Receptors. The Council therefore considers that NV05 should be amended to require the submission and approval of the relevant detailed assessments and mitigation proposals as part of the stage-specific NVMP process. Until such amendments are secured, the Council remains concerned that the CoCP and NVMP do not provide an adequate approval role for the Local Planning Authority in relation to detailed noise and vibration assessments. [Applicant note: this submission has been summarised]	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 6.3a.
6.3	Babergh and Mid Suffolk District Councils [REP6-136] The Councils are in discussion with the Applicant, in its capacity as developer for Bramford to Twinstead, about agreeing a compliance, monitoring, and reporting process. The Council and the Applicant remain in dialogue on this matter, including the need to discuss this with the Norwich to Tilbury and Sealink teams, as it will set a precedent for the delivery of those Development Consent Orders. While the management plans set out steps for reporting on compliance identified by the contractor or the Applicant, it remains unclear what process will apply where a third-party complaint is received. An agreed process is required, as complaints are made to the Councils regularly in their capacity as enforcing authorities. The Councils are working on behalf of the lead authorities for Bramford to Twinstead with the Applicant to find a workable approach that does not delay delivery of the project, and are hopeful that this can be achieved, but noted that a resolution has not yet been reached for any of the relevant projects. [Applicant note: this submission has been summarised]	Commitment NV05 of 7.2 Outline Code of Construction Practice [Revision G] was updated at Deadline 6 to clarify that monitoring and associated and reporting would be undertaken through agreement with the relevant local planning authority. This is reflected in 7.2 Appendix F Outline Noise and Vibration Management Plan [Revision D]. Complaints would be managed in accordance with a complaint procedure, secured by commitment GG37 of 7.2 Outline Code of Construction Practice [Revision G].
7	Aviation safety	
7	General Aviation Awareness Council (GAAC) [REP6-149] Serious concerns were raised by [Redacted] about the risk of the Project to Tibenham, Priory Farm and Raydon Wings and appropriate mitigation could not be identified:	As per the Applicant's response to the General Aviation Awareness Council previous representation REP4-361 within 5.1a of 8.4.12 Applicant's Comment on Post-Hearing Submissions and Interested Party Action Points [REP5-194] and its response to SS 2.3 within 8.9.2 Applicant's Response to Second Written Questions [REP5-211] the Applicant strongly refutes the repeated misrepresentation by the GAAC that aerodromes were not appropriately considered at an early stage of route development. It has also

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	‘From our earliest engagement, we have provided signal that when considering proposed power line routing, it is not the aircraft performance envelope that is the limiting factor. Therefore, any intimation that a specific type can manoeuvre to avoid such vertical obstructions should be disregarded’ ‘To some extent, the impacts to Tibenham and Priory farm are interlinked and complex, owing to their close proximity to each other’. The simplified Aviation Impact Assessment published by the Applicant ignored expert advice and concluded that, in respect of Tibenham: ‘An aerotow combination would have sufficient room to manoeuvre away from the OHL after take-off’. It is considered that ASA predicated their approach based on their position that unlicensed sites don’t count. It was also stated: ‘There are different safety standards. Licensed airfields have a higher level of safety assurance,’ ‘Unlicensed sites can set their own safety standards’ and ‘That’s why there are licensed and unlicensed.’ This is incorrect, as the requirement for licensing relates to the nature of activities, not to safety standards. [Applicant note: this submission has been summarised]	made clear that its impact assessment approach (being site-specific and considering multiple factors – see paragraphs 15.3.22 to 15.3.23 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]) is entirely consistent with the principles of the advice of the Civil Aviation Authority Airfields Advisory Team (CAA AAT) as well as in accordance with national policy and Civil Aviation Authority (CAA) guidance. It is not appropriate for us to comment on any other National Grid projects which have not yet submitted their applications as their assessment and methodologies are not yet in the public domain.
	The choice to operate or not should not be forced on an operator by an NSIP application that does not comply with National Policy Statement EN-1 or paragraphs (in particular) 111(f) and 200 of the National Planning Policy Framework. [Applicant note: this submission has been summarised]	
	It is considered that National Grid ignored aviation safety at the start of scheme design. There was no reference to aviation in the original ‘East Anglia Green’ documents. The GAAC wrote to EAG on 13 June 2022 and again on 11 July 2023 urging engagement with aerodrome operators, but no response was received. Once the Applicant identified a need to address aviation, the route was already fairly firmly defined. It is considered that there was not a proper appraisal undertaken by the Applicant, which usually involves site specific appraisals defining the nature of the activities, examining topography and site characteristics, and endeavouring to make adjustments so as to minimise adverse impacts on the aviation interests. This has been undertaken on another National Grid project. [Applicant note: this submission has been summarised]	
	The Applicant rebuttal states that the team at ASA is experienced and this is not challenged. However, they do not have the site specific experience and knowledge and as has been explained before, the CAA regards the aerodrome operator as the expert, having a detailed understanding of topography, weather and the nature of the activities taking place. In addition, the assessment methodology which ASA has applied has been significantly more basic than, for example, the highly specialist and professional work undertaken by [Redacted], a renowned aviation safety expert. [Applicant note: this submission has been summarised]	
	The Applicant has recently been seeking to reach some agreement with aerodromes, but this should have been undertaken in 2022 at which time minor route adjustments for a mutually satisfactory alignment would have been possible. [Applicant note: this submission has been summarised]	

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7.2	Priory Farm Aviators [REP6-227] At the hearing, the Applicant stated that they had not had the opportunity to speak to Priory Farm Aviators since last summer. This is considered to be misleading, as there have been numerous mailings to validate and rectify narratives in the Statement of Common Ground. [Applicant note: this submission has been summarised]	The Applicant provided an update on discussions with Priory Farm Aviators 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 7.2c. The Applicant has responded to the Priory Farm Aviators' representation within 7.1 of 8.31 Response to the Rule 17 letter received 14 July 2026 [Revision A].
	At the hearing, the Applicant stated that the operator had re-plotted their aerodrome's circuit patterns and that there were some differences between various published routes that they have at the moment. An additional impact assessment had been undertaken relating to the newly plotted 500 foot circuit, which now no longer overlies the overhead line but is in close lateral proximity. It can be confirmed that the routes have not been replotted, have been in existence for decades and have been available both locally and in recent years published on apps like SkyDemon. A 3D model of the plan was shared at a face to face meeting in Dunston Hall Norwich in 2025. [Applicant note: this submission has been summarised]	
	The Applicant stated that the assessment has been shared with the operator, including an initial view of impacts and proposed mitigation, with a follow-up meeting proposed. It is likely there is even less chance of mitigation now, given the confirmed proximity and mention by ASL to route towards the already blocked airspace of Tibenham. The routes may not overfly the overhead lines (by feet) but the proximity makes it a very significant danger, particularly at the extremities of the downwind leg. The ideas we have already responded to (offering an option that turns us into the already blocked area at Tibenham) are not a viable alternative. If we are using the north runway, so are they. There is a shared concern with Tibenham about the impact that National Grid will have on both our operations and income. Some salient factors that directly affect an 'idealised departure' path depicted in the Priory OCL documents: • Very differing types of aircraft and, thereby, related performance, many being low weight, low engine powered • Pilots not having full currency (locals or the numerous visiting aircraft – we had 75 at the fly in this April) • The north-south orientation of our only runway means many take offs are crosswind and so not providing the idealised exit path that a normal 'into wind' would offer in terms of climb rate [Applicant note: this submission has been summarised]	
	At the hearing, the Applicant stated that they were hoping some matters in the Statement of Common Ground (SoCG) with Priory Farm Aviators would be agreed and that the document could be signed. It is considered that Priory Farm Aviators are unable to sign the SoCG given that basic mitigation options are fundamentally flawed and inappropriate: • The proposed diagram shows a change in circuit pattern towards Tibenham (east), which will not be allowable and why all our current turns head west out of our airfield	

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	- There can be no alteration of procedures as we have repeatedly stated due to the proximity of Tibenham. The recent suggestion of an additional 'dog leg' away from the 01 departure at Priory (to avoid the pylons) serves to demonstrate this, as we are then in direct conflict with Tibenham - Lowering the pylons serves no real purpose and in fact it makes the situation potentially worse as there would be more frequent pylons, increasing the amount of vertical metal - Markers do not serve as a deterrent, although would assist in eyeballing in any emergency - The proximity to the existing 500 foot circuit makes the likelihood of a bad result post any engine issues on departure of either runway untenable [Applicant note: this submission has been summarised]	
	At the hearing, the Applicant discussed the 500 foot and 1000 foot circuits (typically larger aircraft or new arrivals use the 1000 foot circuit, smaller and more experienced (to the runway) use the 500 foot circuit) and suggested that one potential mitigation option is to no longer use the 500 foot circuit. This mitigation option has not been discussed with Priory Farm Aviators and is most definitely remaining, being favoured by a large percentage of local pilots. [Applicant note: this submission has been summarised]	
7	Norfolk County Council (REP6-158) Norfolk County Council wishes to see progress towards agreement between the Applicant and the airfields but has no specific comments to make on this item.	The Applicant notes this comment.
7	Norfolk Gliding Club (REP6-219) At the hearing, the Applicant appeared confused when addressing the matter of aviation and public safety, quoting the 'chicken and egg problem' and the responsibilities of the aerodrome operator. As far as the aerodrome operator is concerned, CAA guidelines/ advice confirms that the operator is responsible for public safety and holds the '<i>expert opinion as to safety when it comes to the question of proposed obstacles around their airfield</i>'. Current operations with respect to runways 26 and 33 can continue without the question of public safety being an issue and within those CAA guidelines/advice. The Applicant is proposing a 200 foot electrified wall across the ends of the two runways, creating an unacceptable aviation safety risk to operations on both runways, which has repeatedly been identified by ourselves as the aerodrome operator, the BGA and other aviation bodies such as Eddowes Aviation Safety Consultants. There is no 'chicken and egg problem' as currently there is no public safety issue. [Applicant note: this submission has been summarised]	The Applicant has responded to the Norfolk Gliding Club representation within 7.1 of 8.31 Response to the Rule 17 letter received 14 July 2026 [Revision A] .
	When responding to the possibility of Engine Failure After Take Off (EFATO) and similar incidents, the Applicant has acknowledged that '<i>...there is a period in the middle where hitting the line is a possibility</i>'. Such a collision is frequently fatal or results in life changing injuries. The Applicant has also stated in REP4-302 that '<i>in the event of an emergency an aircraft taking off from runway 26 or 33 could collide with the OHL</i>'. If the Project went ahead as proposed, the aerodrome operator would have to close both runways in order to continue safe operations. However, as the 'agent of	

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	change', paragraph 200 of the National Planning Policy Framework (NPPF) states that the Applicant has responsibility for mitigation in these circumstances. The adverse impact can only be resolved by the Applicant proposing design-led mitigation (such as realignment or undergrounding). Norfolk Gliding Club do not agree with the approach National Grid have adopted and have objected to the approach and proposals for an OHL to be built so close to the ends of two of our runways on the grounds of aviation safety ever since we attended the first non-statutory consultation. The adopted approach involving the AIA was identified by the CAA AAT in March 2025 as inappropriate and a written explanation of why the Applicant chose to ignore that advice (from CAA AAT) has not been provided. Norfolk Gliding Club along with all other airfield operators in the UK have to abide by the advice, guidance and rules promulgated by the CAA. In the event of an accident, it would be CAA rules that would determine culpability and therefore any and all aviation safety issues should be determined with that in mind. [Applicant note: this submission has been summarised]	
	With regard to consultation, the Applicant agreed in the SoCG and AIA to provide written explanations of pertinent data that would enable a meaningful discussion of both documents. That discussion would have included all mitigation options and highlighted the aviation safety risk posed by the pylons and the fact both runways would have to be closed (contrary to National Policy Statement EN-1 and the NPPF). However, the pertinent information has been withheld and the consultation was adjourned to give them time to reconsider. The consultation has not resumed, preventing the development of and possible acceptance of the SoCG and AIA. The Applicant claims that consultation with Norfolk Gliding Club started in 2022 and that all airfields were considered from the inception of the Project, even though only two airfields were identified in the April 2022 routeing report. In a report from the initial Palgrave/ National Grid presentation in 2022, a resident commented that National Grid had stated that they believed Tibenham and Priory Farm were non-operational and it came as a surprise when they were told otherwise by one of the audience members. How does that response relate to the claim that all airfields were considered and having been made aware why did they not contact both airfields as a matter of urgency? Consultation with the Applicant has not been meaningful. [Applicant note: this submission has been summarised]	
	The Applicant has presented drawings indicating that on a straight glide to land on 08 from the west (for example in a competition finish) there would be some high-performance gliders that would be lower than 200 foot as they crossed the pylon line. The Applicant claimed that it has been agreed that the minimum clearance should be 100 foot. There has been no such discussion or agreement with Norfolk Gliding Club. The Applicant concluded that <i>'No one would be that low that far out'</i> and <i>'You just need to change competition rules to ensure higher finishes'</i>. Success or failure can influence the selection of glider competition pilots for the British Team. They could easily be below the proposed pylon height if it gives them an advantage. Whilst we can set up local competition rules to promote higher finishes, all pilots returning from the west need to get back to the airfield and an unexpected loss of height due to a failed thermal or misjudgement on the final glide could result in collision with the OHL.	

Item No.	Third Party Comment	Applicant's Response
	[Applicant note: this submission has been summarised]	
9	Any other matters	
AOB	The Langley's Estate [REP6-169] Having listened carefully to National Grid's responses to my concerns during the hearings, I wish to raise the following points. It is concerning that landowners were not informed that National Grid had changed its position regarding the infrastructure that was originally presented as potentially benefiting farms. We now understand that this infrastructure is to be temporary and removed following construction. Why were landowners not notified of this significant change? It raises the question of whether the original proposals were presented in this way to encourage landowner support and reduce objections to the project. The destruction of productive agricultural land to accommodate temporary infrastructure is neither environmentally responsible nor consistent with the project's stated sustainability objectives. It represents a significant waste of resources. Furthermore, what is National Grid's plan for the substantial volumes of concrete and other materials that will need to be disposed of once this temporary infrastructure is removed? The extensive use of heavy construction machinery will inevitably cause soil compaction across agricultural land. Even with reinstatement works, it is unrealistic to suggest that the land can be restored to its current condition and agricultural productivity. Had National Grid engaged constructively with landowners and farmers, whose local knowledge of the land is invaluable, much of this avoidable damage could potentially have been minimised. I am also concerned that National Grid and its agents are seeking agreement for pre-access works before Heads of Terms have been agreed with landowners. On our land alone, approximately 8 hectares would be taken out of agricultural production, and the proposed works would have a significant impact on both Larks Lane and Chatham Hall Lane. These are rural lanes rather than major roads and are characteristic of the quiet rural environment in which they are situated. It seems wholly inappropriate to seek early access for works that may ultimately prove unnecessary if the route is altered, if HVDC undergrounding is recommended, or if the Development Consent Order is not granted. In these circumstances, are National Grid intending to rely on compulsory powers to gain access and undertake these works before agreement has been reached?	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 Alternatives [Revision B]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [Revision B]). All land temporarily required would be reinstated in line with 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D], including land required for haul roads. The Outline Soil Resource Plan also details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), or the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. Temporary disruption to farming operations during construction (including disruption from haul roads) would be reduced through good practice, such as maintaining/ providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [Revision G]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example in relation to temporary land take, reduced yields due to irrigation disruption, etc.). The Applicant notes that the works the representation refers to are proposed through separate Town and Country Planning Act (TCPA) applications and do not form part of the powers sought through the Development Consent Order. The TCPA applications are being progressed under a separate consenting regime and relate to limited advance works which are capable of reinstatement should the DCO not ultimately be granted. The Applicant is not seeking to rely upon DCO compulsory acquisition powers to undertake those TCPA works in advance of the determination of the DCO application. Furthermore, the TCPA works do not predetermine the outcome of the Examination or any decision on the DCO application. As has been explained in relation to the TCPA applications, the Proposed Development would still be capable of proceeding in the absence of those advance works, and appropriate reinstatement measures would be implemented should the DCO not be granted.
AOB	Norfolk County Council (REP6-158) Drainage strategy and flood risk References to 'points' are to paragraphs in [REP5-257]. The version of the Drainage Strategy referred to is the deadline 4 submission [REP4-187]. References to National Policy Statement (NPS) EN-1 refer to the 2024 version. Norfolk County Council has significant concerns in relation to drainage and flood risk and does not consider that these matters are likely to be resolved by the close of the Examination as previously set out in: • [REP1-173] • [REP2-037] • [REP3-083] • [REP5-256]	The Applicant submitted an updated Drainage Strategy at Deadline 6 (8.2 Drainage Strategy DCO [REP6-096]). The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. As will be reflected in the signed statement of common ground with Norfolk County Council (5.9.1 Signed Statement of Common Ground - Norfolk County Council (LLFA and Highways) [Revision E]), the Applicant has engaged with the LLFA on a number of matters, however, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed. The Applicant considers the Drainage Strategy to be proportionate for the nature and scale of the Project and has considered the requirements of all relevant statutory undertakers in developing the strategy.

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	[REP5-257] [Applicant note: this submission has been summarised] Failure to comply with national policy and guidance The Drainage Strategy fails to comply with national policy and guidance. Paragraph 5.8.15 of NPS EN-1 sets out the minimum requirements for a flood risk assessment, which incorporates requirements for information relating to existing drainage arrangements and proposed drainage systems. Specifically, the policy requires applicants to demonstrate how the hierarchy of drainage options has been followed and explain and justify why the types of sustainable drainage systems (SuDS) and method of discharge have been selected. Paragraph 5.8.37 sets out that the Secretary of State will need to be satisfied that the proposed drainage system complies with National standards for SuDS, which sets out that infiltration testing is required to ensure that ground conditions are suitable. The standards also provide that <i>‘to utilise a lesser priority final destination, appropriate evidence shall be provided that demonstrates that all higher priority final destinations have been utilised to the maximum extent practicable’</i>. This inevitably requires infiltration testing to ensure that infiltration (i.e. priority 2 of the discharge hierarchy) has been maximised. The way this requirement is framed in policy means that this is not optional. Because the sizing (and therefore land take) of SuDS features is heavily dependent on infiltration and runoff rates, and because the Order Limits are fixed at the point a Development Consent Order is consented, this evidence cannot be left to the detailed design stage. No infiltration testing has occurred to enable the application of the discharge hierarchy (Point 18). The Applicant has therefore failed to demonstrate how the hierarchy of drainage options has been followed and has failed to explain and justify why the type of SuDS and method of discharge have been selected and why they are considered appropriate. The critical national priority presumption does not apply in cases where there is unacceptable flood risk (paragraph 4.2.15). Paragraph 5.8.40 requires that where a flood risk management authority (in this case the LLFA) has concerns, the Secretary of State can only grant consent where he is satisfied that all reasonable steps have been taken by the Applicant and the authority to try to resolve the concerns. In Norfolk County Council's view, the Applicant has not taken all reasonable steps to resolve our concerns. Further instances of the failure to comply with policy and guidance include: - Incomplete information (Point 25). - Incorrect referencing to guidance (Point 27). [Applicant note: this submission has been summarised]	The Applicant disagrees that the Proposed Development fails to comply with the requirements set out in EN-1 (2024). As stated in the Applicant's response to Norfolk County Council in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicant will follow the discharge hierarchy set out in Section 5.3 of 8.2 Drainage Strategy DCO [Revision D]. As described therein, appropriate justification will be provided where progression through the hierarchy is required. The Applicant considers the Drainage Strategy to be proportionate for the nature and scale of the Project and that it satisfies the minimum requirements of EN-1 (2024) paragraph 5.8.15. Section 5 of 8.2 Drainage Strategy DCO [Revision D] sets out the proposed approach to managing and discharging surface water through sustainable drainage systems (SuDS), accounting for climate change and following the National Standards for Sustainable Drainage Systems. The design has applied the discharge hierarchy in principle by seeking to replicate existing drainage processes within each catchment as closely as practicable. The proposed SuDS measures and discharge methods have been developed taking account of site-specific constraints, available ground conditions information, flood risk, existing surface water flow paths and existing drainage networks. The Applicant therefore considers the selected SuDS measures and discharge methods to be appropriate and capable of providing sustainable and effective management of surface water runoff. The Order Limits and associated class of rights sought by the Proposed Development are proportionate and provide sufficient land to provide any resulting sustainable drainage systems (SuDS) infrastructure, following the discharge hierarchy. The Applicant does not consider it proportionate (or necessary to the production of an accurate flood risk assessment) to undertake infiltration testing along the entire route prior to the grant of development consent. In accordance with EN-5 paragraph 2.9.14 and EN-1 paragraph 4.1.2, National Grid has a statutory duty to develop an efficient, coordinated and economical system. The drainage strategy and scope of ground investigations undertaken to date have therefore been developed on a proportionate basis, balancing technical requirements, environmental considerations, and the cost and programme implications of undertaking route-wide infiltration testing. By undertaking this assessment and presenting the outline mitigation strategy within 8.2 Drainage Strategy DCO [Revision D], the Applicant considers that it has complied with the requirements of EN-1 and in particular satisfies the following requirement in Paragraph 5.8.15 EN-1 (2024), specifically with regard to how the Applicant should <i>‘consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include:</i> <i>iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate</i> <i>iv. Demonstrate how the hierarchy of drainage options has been followed.</i> <i>v. Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate.’</i> The Applicant considers that sufficient information has been provided at this stage to demonstrate that an appropriate and policy-compliant drainage solution can be developed through the detailed design process within the Order Limits sought by the Proposed Development. Notwithstanding this, infiltration testing is not considered necessary in all locations. Existing ground investigation data, published geological mapping and other site-specific information may already demonstrate that infiltration drainage would be unsuitable. Where available evidence indicates that infiltration is unlikely to be feasible due to prevailing ground conditions, groundwater levels, contamination constraints or other site-specific factors, further infiltration testing would not materially influence the

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		drainage strategy and the Applicant suggests it is reasonable to progress to the next level of the drainage hierarchy, when considering the DCO Order Limits required for the Project. The detailed design will be informed by the detailed ground investigation programme to be undertaken across the Project route. Where the findings of the ground investigations corroborate the conclusions of the desktop assessment and indicate that infiltration is unlikely to be feasible, further infiltration testing would not be necessary. Conversely, where the investigations identify potentially suitable ground conditions for infiltration, additional site-specific infiltration testing will be undertaken where appropriate to support the detailed drainage design in compliance with the drainage hierarchy. Furthermore, detailed infiltration testing is dependent on the final locations of drainage infrastructure, which will only be confirmed during detailed design. This supports the Applicants position that infiltration testing along the entire route prior to the grant of development consent is not proportionate. Site-specific infiltration testing and drainage design development will be undertaken where appropriate during detailed design and are secured through the Surface Water Management Plan pursuant to commitment GG22 within 7.2 Outline Code of Construction Practice [Revision G]. The detailed drainage design process will enable further investigations where necessary and ensure that the final drainage solution is supported by appropriate evidence and agreed with the relevant Lead Local Flood Authority and statutory stakeholders. The Applicant has taken reasonable steps to address the concerns raised by Norfolk County Council as Lead Local Flood Authority. The assessment and mitigation measures presented within 8.2 Drainage Strategy DCO [Revision D] identify the potential effects of the Project on existing surface water flow paths and field drainage networks and establish the principles of the drainage strategy. The further drainage information requested by the LLFA is consistent with these established principles and will be developed through the detailed design process in accordance with Commitment GG22 within 7.2 Outline Code of Construction Practice [Revision G].
	Inconsistencies within the Drainage Strategy and between other relevant Reports • The commitment to controlling runoff to the greenfield runoff rate across the development but then later indicating the discharge rate could vary between the IDB ordinary watercourses and the LLFA's Ordinary Watercourses (Point 37). • Inconsistencies in the lifetime of some structures such as temporary culverts (Point 86). • References to Appendix B which does not contain the information that is indicated to be there in the Drainage Strategy (Points 27, 29, 31, 73). • Inconsistencies within technical assumptions, such as around the permeability of the construction compounds that are considered fully permeable by the applicant in the text, but only 80% impermeable in the impermeability table (Points 41, 56, 68, 69, 70, 85). • There are occasions when the inconsistencies and lack of clarity in the text of the drainage strategy have not been justified, such as the haul road widths (Point 47), making it difficult to interpret the design approach or the formation approach used for all the different types of construction areas (Points 49, 52, 75). • Discrepancies with the outline Code of Construction Practice (OCoCP) [REP5-139] (Points 14, 45, 69). • Amendments not following through to other documents such as the OCoCP, FRA, the ES and the environmental enhancements being offered (Points 14, 45, 57, 66, 69, 83, 84).	The Applicant has provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in Section 16 and Appendix A of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicants position has not changed since the prior response.

Item No.	Third Party Comment	Applicant's Response
	References to Article 20 of the DCO in relation to Ordinary Watercourse Consenting outside of the IDB areas, although this is not covered in Article 20 of the Draft DCO (further information is found in Point 30). [Applicant note: this submission has been summarised]	
	Lack of Technical Evidence Key data gaps in the evidence base supporting the Drainage Strategy include: - A lack of infiltration testing (Point 38) - Groundwater levels in the area of the attenuation basins (Points 17, 77, 78) - Watercourse discharge locations (Point 64) - Not providing key internal design guides that are referenced in the Drainage Strategy (Points 21, 62) - Technical assessment even though it is stated as having been undertaken (Point 15) - Incomplete datasets, which means it is not possible to determine whether or not there is an increase in flood risk (Point 33) As a result of the data gaps, it is not possible to determine whether: - Infiltration to the ground is viable as no infiltration testing has occurred (Point 38). - The proposed SuDS attenuation basins will be impacted on by groundwater due to a lack of groundwater investigation (Point 17). - The construction drainage strategy Plan A (discharge to ground) or Plan B (discharge to a watercourse) is viable as no supporting evidence has been provided (Points 53, 63, 68, 71) e.g. there is no information about the proposed plan B discharge of surface water to watercourses being viable as no information was included in Appendix B (Points 27, 29, 31). - There is an increase in flood risk, as the information in Appendix A does not contain greenfield runoff rates for each of the discreet drainage areas along the route (Points 33, 60, 71). There is no discussion or information on how the water would be collected and discharged to the attenuation basins (Points 53, 60, 68, 71). There is also very limited site specific topographic survey (Point 61). [Applicant note: this submission has been summarised]	The Applicant has provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in Section 16 and Appendix A of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicants position has not changed since the prior response.
	Poor Quality Data and Information Some data and information is either coarse, or difficult to interpret, such as the use of the Lidar data (Points 6, 61) or the elevation drawings of the overhead line that have no hydraulic or hydrological features marked on them (Point 7). There is evidence of poor quality reporting throughout the Drainage Strategy which ranges from incorrect definitions of a Watercourse to the designation of Main Rivers and Ordinary Watercourses that is not consistent with the legal definition (Point 8). [Applicant note: this submission has been summarised]	The Applicant has provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in Section 16 and Appendix A of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicants position has not changed since the prior response.

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	Unclear Reporting The preparation of the Drainage Strategy report is not always clear, such as when a section title does not contain the information stated to be within it (Point 10). There are occasions where it is not clear what work is being proposed (Points 11, 12). The reporting of the baseline conditions within the Drainage Strategy also varies greatly, both in terms of presentation and the level of detail in the various sections (Point 16). The discussion on some issues leaves the reader unclear on what is being either stated or proposed (Points 17, 34, 42, 43). [Applicant note: this submission has been summarised]	The Applicant has provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in Section 16 and Appendix A of 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicants position has not changed since the prior response.

7. Comments on the Summaries of Oral Cases from OFH4

7.1 Agenda Item 4 (Representations by interested parties and others)

Table 7.1 Comments on representations by interested parties and others from OFH4

Party	PINS ref	Third party comment	Applicant’s Response
Ward Hadaway LLP on behalf of Northumbrian Water Limited (NWL)	[REP6-173]	Impact of the Project The Applicant has recently proposed changes known as CR1 and CR2. Early searches indicate that CR1 affects additional NWL assets, but investigations are ongoing. The additional NWL interests identified so far are proposed to be subject to compulsory acquisition of rights and powers of temporary use. The affected plots appear to be parcel numbers – 1B/15, 1A/3, 1A/12, 1A/14, 1A/16, 1A/17, 2/15, 2/24-27. [Applicant note: this submission has been summarised]	Noted. In terms of asset interactions arising from the change applications, the Applicant does not see any reason why interactions cannot be addressed in the same way that all the other interactions in the Project have been and to this extent the Protective Provisions will ensure the affected party approves the details of any crossings of their apparatus. The Applicant has responded to individual points raised by NWL below.
		Additional Assets Affected by CR1 CR1 impacts four NWL water mains, two of which are distribution mains and two are strategic mains. If the powers in the draft Order were exercised, and flows were turned off in those mains, a significant number of businesses and members of the public could be affected. The number of households potentially affected by the proposal is approximately 37,000. [Applicant note: this submission has been summarised]	The Applicant is not proposing to adversely impact the noted distribution and strategic mains nor does the Order propose or require for flows to be turned off in those mains. Within the Applicant’s preferred set of Protective Provisions submitted within the draft Order Retained Apparatus Protections are included providing sufficient protection to all of the respondent’s apparatus including the four noted water mains. The Applicant’s detailed design engineering team continues to have significant and proactive engagement with the Northumbrian Water Limited Asset Protection team across all apparatus interacted with.
		Lack of Protections and Risk of Serious Detriment There are no agreed protective provisions or side agreements between NWL and the Applicant. That remains the case, in respect of proposed change CR1. NWL cannot confirm that the compulsory acquisition of land or rights proposed in CR1 would not cause serious detriment to NWL’s ability to carry out its statutory duties. NWL has raised concerns in relation to cost-sharing arrangements similar to those under the New Roads and Street Works Act, an approach that was and continues to be firmly opposed by NWL in relation to the draft Order for Sea Link. Notwithstanding those concerns, the Applicant’s solicitors provided revised protective provisions which for the first time introduced cost sharing. Any interference with NWL’s apparatus must follow section 185 of the Water Industry Act 1991, which provides for a statutory form of compensation that does not allow for cost sharing. As drafted, the Applicant’s proposed provisions are internally inconsistent and are likely to lead to substantial dispute between the parties. If the Order and the protective provisions are made in a way that allows for cost sharing, those provisions will risk delaying the Project significantly or even make it unimplementable. Unless and until the Applicant softens its stance on the need for cost	The parties have been engaging proactively to narrow the issues and have identified that the material point focuses on whether the Water Industry Act 1991 can allow additional mechanisms to regulate compensation and costs for diverting water apparatus. The parties are continuing to engage to agree wording in respect of this point but it is understood that all other provisions are in an agreed form. The outstanding provisions being discussed do not relate to the protections regarding any compulsory acquisition of NWL’s land or affect its ability to carry out its statutory duties. Under the proposed wording of both parties, NWL is comprehensively protected and fully compensated for any costs it incurs. The issue is the manner in which that compensation is affected.

Party	PINS ref	Third party comment	Applicant's Response
		sharing or provides a proper reasoned justification for those arrangements notwithstanding the significant legal problems highlighted by NWL's solicitor, it will not be possible for the Applicant to progress the negotiations of the protective provisions with NWL. [Applicant note: this submission has been summarised]	
		Conclusion In the absence of agreed protective provisions, NWL is not satisfied that the Applicant has demonstrated that the removal or extinguishment of NWL's assets is necessary, or that it would not cause serious detriment to NWL's statutory undertaking. For those reasons, NWL maintains its objection to the Order and specifically the change known as CR1. [Applicant note: this submission has been summarised]	The Protective Provisions are substantially agreed and the only outstanding matters relate to the mechanism by which NWL can recover its costs for any diversion or alteration of its apparatus. Within both parties' preferred sets of Protective Provisions Retained Apparatus protections, costs, expenses and indemnity provisions and restrictions on the use of compulsory acquisition powers are all included providing sufficient protection to all of the respondent's apparatus. While the parties are continuing to engage to reach agreement on Protective Provisions, the Applicant maintains that there are sufficient protections included in the agreed provisions such that there is no serious detriment to NWL's undertaking.
Brumfelda, Broomfield's Local History Group	[REP6-180]	To summarise from the attached report by our archaeological consultant [Redacted]: a) The site is a potentially unique Romano-British temple site because it appears to continue on from prehistoric ritual use in roughly the same position; b) There appears to be a strong relationship between the likely temple itself and the wider context of the surrounding landscape; and c) The project is at an early stage of discovery, so there is much that cannot be safely predicted at this stage; and much that could be lost if we get things wrong. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1 (pp. 18-19) and is addressed in response to ExQ2 HE 2.11 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211] , page 111-113.
		The Applicant's response in relation to avoiding impacts through micrositng pylons at the detailed design stage left us feeling somewhat underwhelmed and very un-reassured. The Applicant classified the site as 'a relatively small asset', which does not take account of the asset's potential relationship with its wider setting. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1 (pp. 18-19) and is addressed in response to ExQ2 HE 2.11 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211] , page 111-113. As no new matters have been raised the Applicant does not have any further comments to make.
		Six weeks before the end of the Examination, the results of trial trenching are still not available and geophysical surveys have only recently become so. It is therefore not clear how the Applicant has taken into account National Policy Statement (NPS) EN-5 paragraph 2.10.1 about considering and addressing routing and avoidance. Essex County Council has also raised concerns that, due to soils, geophysical results may not be complete or illuminating. The impact of the Project on this site and exactly what will be permanently lost is not clear. [Applicant note: this submission has been summarised]	The Applicant provided comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1 (pp. 18-19) and in response to ExQ2 HE 2.11 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211] , page 111-113. The response to HE 2.11 sets out the embedded mitigation that has already been included in the design to move pylon TB149 to the south, as far from the asset as possible within the field. As also set out in the HE 2.11 response, the comparison of the geophysical survey of the pylon working area for TB149 and the associated haul road with the survey undertaken by Brumfelda of the asset itself demonstrate very different results, with only anomalies of agricultural (plough scaring), land drain, and natural origin identified in the Project impact areas, which is why no further embedded mitigation has been proposed. The Applicant responded regarding the reliability of geophysical survey in HE 1.47 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] , page

Party	PINS ref	Third party comment	Applicant's Response
			411-413. However, given the two geophysical surveys that have been undertaken in this area, and the clear difference in their results, there is better confidence in the results in this area than in some other areas of the Project.
		The Applicant says that there would be potential to move the pylon working areas and haul road within the Limits of Deviation, but then immediately says this would depend on balancing various considerations such as engineering feasibility, ground conditions and proportionality of costs. There is only a 'small potential' to move the working area for pylon TB149 laterally and probably none longitudinally. The potential to avoid impact through micrositing therefore appears to be 'Very little to none at all'. [Applicant note: this submission has been summarised]	The Applicant notes the respondent's comment, with regards to TB149, this pylon was moved southwards in response to feedback received during consultation regarding this asset. The ability for the pylon and its working area to be microsited further is dependent on balancing the considerations mentioned, which will only be known at the detailed design stage. As detailed in the responses to ALT 1.8 and CA 1.21 of 8.9.1 Applicant's Responses to First Written Questions [REP3-074] in keeping with other DCO applications and in line with the use of the Rochdale Envelope, the application design has been developed in a proportionate manner (i.e. a design appropriate for the application but not a full engineering design). The LoD provide flexibility to respond to as yet unknown physical characteristics of the particular location. As a result, there are also some smaller changes requested by APs (within the LoD and the Order Limits) where there remains some scope for adjustment. Because some of these potential changes may be close to the maximum LoD, the Applicant is cautious to make such changes when there remains uncertainty about the physical characteristics and potential that the change may not be able to be implemented due to the new build nature of the Project. The actual physical characteristics that influence micro-siting will be identified by the completion of location specific intrusive investigations and detailed design undertaken by the Applicant's delivery partner. This potential for further micrositing will be considered through the detailed design and informed by site specific discussions between the Applicant and the relevant landowner(s). The Applicant is maintaining records of the landowner engagement received to date including any aspirational commitments, so that these can be further considered during the detailed design stage, subject to technical, socio-economic, environmental and constructability considerations.
		The need for a Faraday Cage over the adjacent gas pipeline is unclear. At the formal consultation stage in 2024, there apparently was a need. The Order Limits included a significant east-west salient for this purpose, which took the working area even closer to the asset than did the pylon itself. It now seems unclear if the Faraday Cage is needed or not. [Applicant note: this submission has been summarised]	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1.
		The History Group's view is that the site can best be protected by a change of alignment. This would also better comply with NPS EN-1 paragraph 5.9.18, which notes that '<i>a documentary record (of excavation) is not as valuable as retaining the heritage asset</i>'. In our earlier written representation [REP1-215], we proposed a slight change of alignment of approximately 100 metres the west. This would also have a slight but beneficial effect on the setting of the listed vault west of Partridge Green Farm.	The Applicant notes the respondent's comment, with regards to TB149, this pylon was moved southwards in response to feedback received during consultation regarding this asset. The ability for the pylon and its working area to be microsited further is dependent on balancing the considerations mentioned, which will only be known at the detailed design stage. The alternative to move the alignment approximately 100 m to the west would take it closer to Bushy Wood Ancient Woodland and likely impact other patches of trees to the west of the order limits. To move onto the alignment as suggested would require an additional angle pylon to navigate around the woodland accordingly.
		More effective still would be the use of the 'West of Great Waltham alternative'. This would be only 1.36km further than the Preferred Route and would avoid the site altogether. At the same time, it would	The Applicant considered alternative route alignments around Great and Little Waltham, see 5.15 Design Development Report [Revision B] from paragraph 9.2.17. In summary, alternative routes were considered less preferred (5.15 Design

Party	PINS ref	Third party comment	Applicant's Response
		remove proposed overhead lines from the Walthams Gap with its host of sensitive heritage assets both above and below ground. We note from Section 9.2.4 of the 5.15 Design Development Report [APP-122] that even the Applicant recognises the relative heritage advantages of this alternative, so we commend it and the other alternatives in the Chelmsford area to the Examining Authority.	Development Report [Revision B], from fifth bullet paragraph 9.2.4). Routes further to the west of Chelmsford and routes further to the east (close to existing overhead lines) were considered. All would result in environmental effects, albeit in a different combination, and such routes are less preferred, due to their greater length, specific constraints relating to, or effects of routeing. The Applicant notes the opinion of the respondent but does not agree with their conclusions. The comparison of alternative routes was made based on an equivalent level of investigation at the time and considering the cumulative position by the comparison of whole sections between common start and end points. Our balanced decision making considering all material factors (environmental, socio-economics, technical and cost. In respect of the Lowley's minerals site, at deadline 5 (10th June 2026) the minerals site referred to has no confirmed planning status, though is acknowledged to be under consideration. The Applicant recognises the potential change in policy status and also the potential claim for sterilised resources and is investigating (and expected to confirm) a localised change in route and pylon positioning to reduce the potential for, or value of, a confirmed claim. Whilst this reduces the cost differential, that is only one of the criteria and it remains the case that the alternative remains longer and is less preferred. Even if others would take a different view then there needs to be careful consideration of the impact of making a change. It is clear that this would, because of the need to complete ecology surveys, be likely to lead to at least a two year programme delay and would not meet the Project Need case given the status as a critical national priority project.
Carolyn Mason	[REP6-182]	National Grid would take irreplaceable land, conflict with national policy, and place an unfair burden on our communities. The proposals, including haul roads, cable trenches, compounds, three substations and one interconnector, will result in the damage and loss of prime agricultural land, much of which is grade 1 and grade 2 best and most versatile land. This land cannot be restored simply by putting the soil back. The National Planning Policy Framework says best and most versatile land should be protected, soil used prudently, and significant adverse impacts avoided, not softened afterwards. This proposal does not avoid harm. The Government Food Strategy commits the UK to maintaining domestic food production. The UK Food Security Report 2024 shows food production is already under pressure from extreme weather, climate volatility and import dependence. In that context, losing our best farmland is not a local inconvenience. It is a national concern. The burden of National Grid's proposal falls with extraordinary force on Ardleigh and Little Bromley. Alongside Five Estuaries, North Falls and Tarcon, the cumulative loss, estimated at over 170 hectares, is far greater than any single project suggests. For two small rural parishes, this is not a balanced share of national infrastructure. It is a disproportionate concentration of harm. [Applicant note: this submission has been summarised]	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 2.1.
		As well as affecting best and most versatile land, the proposals would industrialise our countryside, change the character of our	To assist with nature recovery the Applicant has made a commitment to deliver 10% biodiversity net gain. In addition to replacing the habitat that would be

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		villages, affect wildlife networks, and add to existing pressure from housing, logistics, warehousing and mineral extraction. All take land away from production and enjoyment. Real weight should be given to the loss of irreplaceable farmland, rural character, nature recovery, and local resilience. [Applicant note: this submission has been summarised]	temporarily removed by the Project, the Applicant would fund, through the purchase of biodiversity units, habitat creation and enhancement projects in East Anglia taking into consideration the Local Nature Recovery Strategies in the area. This will make a real and lasting impact and contribute to nature recovery and wildlife networks in the long-term.
		Reasonable alternatives must be properly tested: offshore, brownfield or industrial sites, and undergrounding where it would reduce land take. Renewable energy should not mean sacrificing the land that feeds us when less damaging options have not been fully tested. [Applicant note: this submission has been summarised]	In relation to the consideration of agricultural land, the Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1.
Charles Micklem on behalf of Alexander Micklem	[REP6-183]	I also hope that the drone photographs submitted at Deadline 5 assisted in illustrating those impacts. Those photographs were taken from the location of Tower Base (TB) 140 at an altitude of approximately 52 metres. Since those photographs were submitted, National Grid has confirmed that the proposed pylons at this location will be 56.8 metres in height, demonstrating that the visual impact will be even greater than originally illustrated.	The Applicant has provided a response to the drone photography on page 20 of document 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]. The Applicant notes that in terms of landscape and visual effects, minor-moderate and not significant (adverse) visual effects during construction and operation are reported in document 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Part 4 of 4 [APP-232] at Viewpoint 6.18 Langleys Park, north of Great Waltham. The viewpoint lies approximately 1 km from the Project, with intervening vegetation providing some filtering and screening of views towards the Project. The photomontage on page 103 of the above PDF document shows that the assessed Project is not visible above the tree line from this viewpoint. Taking into account the rotational cropping of the cricket bat willows along the watercourse, the presence of other existing and retained vegetation which will continue to provide screening even with an increase in height, and the distance from the Project, this increase in height would not substantively alter the assessment of effects and minor-moderate and not significant visual effects remain. In terms of historic environment effects the response provided in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119], page 20, noted that the view from viewpoint HE7 would not be affected by removal of the cricket bat willows, as there is other vegetation and built form providing screening. In common with the assessment for landscape and visual effects the increase in pylon height would also not increase the adverse effects, which are assessed for Langleys as a low adverse magnitude of impact resulting in a direct, permanent minor adverse significance of effect (not significant) for construction and operation (and maintenance) (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]).
		Objection to the Proposed Lattice Pylons The Langleys Estate objects to the proposed lattice pylons and considers that further consideration should be given to alternative solutions. According to National Grid's published information, T-pylons are approximately 35 metres high, significantly lower than the 40-metre and 50-metre lattice pylons proposed for this section of the route. In addition, lattice pylons require substantially larger	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1.

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		foundations, using approximately 1.5 times more concrete and occupying around three times the land area of T pylons. In light of these apparent environmental and visual advantages, I respectfully request that the Applicant explains why T-pylons have not been adopted for this section of the route. National Grid's Responses to Written Questions Several responses state: "An email was sent to the landowner on 3 June 2026 with the Applicant's position on a number of the queries raised on 1 June 2026." This statement does not accurately reflect what occurred. Following our meeting on 1 June 2026, our agent circulated eleven agreed action points to both National Grid and Fisher German. The email of 3 June addressed only two of those eleven points. The remaining matters received no substantive response. Throughout this examination National Grid has maintained that it is engaging constructively with affected landowners. However, our experience has been markedly different. Despite numerous meetings and repeated correspondence, we are frequently required to chase responses and often wait several months before receiving any meaningful reply. Since the previous hearings, National Grid has met with us on three separate occasions. Nevertheless, many agreed actions remain outstanding and little meaningful progress has been made. The outstanding matters include: 1. Arranging a meeting with the landscape team. 2. Providing a plan showing whether TB143 could be moved further from Balls Farmhouse. 3. Explaining the proposed works within the badger mitigation area. 4. Providing further information regarding the bellmouth stacking area on Larks Lane. 5. Confirming the maintenance obligations for replacement trees, including whether the maintenance period recommences following replanting. 6. Confirming whether any land management restrictions will apply beneath pylon bases, particularly where those areas contribute towards Biodiversity Net Gain. 7. Confirming whether permanent access tracks could remain where planning permission is subsequently obtained. 8. Clarifying whether the Option and Easement can include a provision relinquishing rights over future access routes if an alternative route is agreed. 9. Providing a large-scale plan showing the entire Estate together with title boundaries and all proposed pylons.	The Applicant met with the landowner and their agent on 9 July 2026 on site at Langleys to provide feedback on a number of questions previously asked by the landowner. A number of additional queries were raised at the meeting and the Applicant is in the process of drafting a response to those. A written response summarising the discussions at the meeting held on 9 July 2026 will be provided in due course. 1. The Applicant is aware the landowner wishes to have a meeting with the landscape team. At the meeting on 9 July 2026, the Applicant requested further information about the purpose of this meeting to ensure the suitable technical specialists can be available. 2. The Applicant has shown a plan of the proposed pylon movement of TB143 at the meeting in person on 9 July 2026. This will be shared via email in due course. 3. Land has been allocated within the Order Limits for badger mitigation should it be necessary to close a main badger sett. The status of all badger setts that need to be closed would be confirmed during the detailed design and construction phase to ensure that sett closures and construction of artificial setts is based on current and up to date information to inform any licence applications. If it is necessary to close a sett and it is found that that clan has no safe suitable alternative setts in the area, then an artificial sett would need to be constructed. Whether or not badger mitigation is required within this specific land parcel and the full details of what these works will entail will only be known following detailed design. The Applicant will continue to engage with the landowner on this matter as further information becomes available. 4. Further information regarding the bellmouth stacking area on Larks Lane was provided verbally at the meeting on site on 9 July 2026. A written summary will be provided by email in due course. 5. Please refer to Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision G] which relates to aftercare and notes that reinstatement will be monitored/managed for a five-year period following the completion of the reinstatement works. The five year period does not restart for trees which have to be replaced during the aftercare period. 6. The land beneath the pylon bases has been included within the Biodiversity Net Gain calculation as habitat loss and not been included in the post-development calculation as enhancement or habitat creation. The management of habitat in this area is not driven by the needs of biodiversity, but by operational needs. There are no long-term management restrictions around the pylons specifically for Biodiversity Net Gain. 7. The Applicant confirmed at the meeting on 9 July 2026 that in general the intention and basis of assessment is that temporary infrastructure is removed. Retention can be considered on a case by case basis and more likely to be acceptable if it is to support development projects and where temporary effects that (will now become permanent) have been assessed and are relatively limited. In such cases, it would be down to the landowner to ensure necessary permissions were secured and for the Applicant to be content that the DCO situation could be

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			regularised. 8. The Applicant confirmed at the meeting on 9 July 2026 that permanent access routes can be amended by way of a voluntary agreement. 9. The Applicant's agents are preparing the large scale maps at the request of the landowner, and these will be sent via post in due course.
		Section 172 Notices The same email dated 3 June 2026 advised that Section 172 notices would be served by the end of that week or early during the week commencing 8 June 2026. At that stage no notices had been received. I address the subsequent service of Section 172 notices in a separate written representation, as I consider those matters to raise wider concerns regarding National Grid's use of statutory powers and its engagement with landowners.	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1. The Applicant has responded to the concerns raised by the AP around s172 notices in document 8.4.16 Applicant's Comments on any Further Information or Submissions by Deadline 6. [REP6-183]
		Heads of Terms National Grid's response at page 137 of Document 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] states that Heads of Terms were discussed at the meeting held on 24 February 2026. That statement is incorrect. Heads of Terms could not have been discussed because Version 2 had not yet been produced. The revised Heads of Terms were not issued until 2 April 2026. Furthermore, I raised at the previous hearings that the Heads of Terms had been prepared in the wrong ownership. I repeated this issue during our meeting on 1 June and again by email on 24 June. Despite these repeated requests, corrected documentation has still not been provided. It would therefore be incorrect to suggest that any delay in completing the Heads of Terms lies with the Estate. We remain unable to review and consider documents that have not yet been prepared correctly.	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1. An update on the Heads of Terms V3 was discussed at the meeting on 9 July 2026 to the landowner and their agent. In addition, the Applicant met with the landowner's agent (Whirledge & Nott) on 15 July 2026 to discuss the revisions with the template draft document. The point around ownership is being addressed between the parties, as the documents issued to date were aligned to the Land Registry records. The Applicant awaits a copy of the transfer deed from the AP's solicitor.
		Alternative Route and Heritage Assessment National Grid responded to my request regarding the alternative route by referring me to Section 5.15 of the Design Development Report [APP-122] , specifically paragraph 9.2.4. However, that section does not discuss the alternative route. Instead, it concerns the selection of high and low-height pylons together with undergrounding options. Similarly, at our meeting on 1 June, National Grid stated that Historic England had requested the use of low-height pylons north of the River Chelmer. When asked to provide evidence supporting that assertion, the documentation subsequently supplied merely records Historic England agreeing with National Grid's proposal. It does not demonstrate that Historic England specifically requested the use of low-height pylons. National Grid has stated that four low-height pylons are proposed because of heritage considerations. My family created and designed this historic parkland. Nevertheless, our views regarding the preservation of that landscape appear to have been given little weight. Instead, National Grid is determining how the landscape should evolve, despite not being responsible for	The Applicant provided comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1 (p. 10).

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		living with the long-term consequences.	
		Assessment of Langleys National Grid states within Document 8.5.7 (Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]) that it undertook a desktop assessment of Langleys. I respectfully request that both the Examining Authority and I are provided with a copy of that assessment. Langleys has remained a private family residence since it was rebuilt by my family in 1720 and has never been open to the public. It would therefore be helpful to understand what information National Grid relied upon when carrying out its assessment and how the accuracy of that information was verified, particularly given that neither National Grid nor Historic England has ever contacted us directly regarding the property.	The Applicant provided comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1 (p. 10). Both the Interested Party and the Examining Authority have access to this information in 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [Revision C] and have done since submission of the DCO application.
		Impact on Farming Businesses and Mental Wellbeing The farming industry already faces significant mental health challenges. Government statistics indicate that approximately 45% of farmers report poor mental wellbeing, while official figures recorded 102 suicides among those working in agriculture during 2019. Projects of this nature inevitably create uncertainty for farming businesses. Along this route, many farmers feel they are steadily losing control over both their land and their livelihoods. Farmers are expected to enter into agreements described as voluntary, yet in practice many feel that the imbalance of bargaining power makes those agreements far from voluntary. They are faced with fundamental questions that remain unanswered, including how farming operations will continue during construction, how businesses will function afterwards and what permanent effects the infrastructure will have on agricultural productivity. Our own experience demonstrates these concerns. A sewer installed across our farm during the 1960s continues to reduce crop yields today. Farmers therefore have genuine reasons to question the long-term effects that this project may have on soil quality and agricultural production. The impacts are not solely physical. The uncertainty, continual negotiations and prolonged delays create significant stress for farming families. Throughout the DCO process I have personally spent approximately three weeks dealing with matters arising from this application during this year alone. That is time which could otherwise have been devoted to restoring hedgerows, planting woodland, maintaining	The assessment of impacts on health and wellbeing is provided in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP6-053]. 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 exercised (a protective factor in mental health and wellbeing). The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication, enabling concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. Concerns relating to disruption to farming operations were summarised in 5.1 Consultation Report [APP-066]. This highlights that, during the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed, seeking to limit disruption where practicable. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. In relation to agricultural productivity, all land temporarily required would be reinstated in line with 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [REP6-075]. The Outline Soil Resource Plan also

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		ponds and undertaking environmental improvements that directly benefit the countryside.	details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), or the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. The Applicant recognises concerns that electricity infrastructure and associated rights may result in long-term restrictions on land use and agricultural productivity. In developing the Project, the Applicant has sought to minimise such effects by limiting permanent land acquisition and instead relying, wherever practicable, on the acquisition of defined rights rather than full ownership of land. The rights sought are confined to those necessary for the safe construction, operation and maintenance of the assets and are designed to enable the continued agricultural use of land beneath and around the infrastructure.
		Outstanding Actions from the Meeting of 25 February 2026 Several action points agreed at the meeting on 25 February 2026 also remain outstanding: 1. Confirmation of farming constraints on neighbouring land, including notification requirements when spraying adjacent to construction areas. 2. Clarification of the proposed timetable for footpath diversions. 3. Further information regarding the badger mitigation area and whether flexibility exists regarding its location. 4. Provision of detailed specifications for the proposed Sustainable Drainage Systems. 5. Confirmation whether sewage sludge or organic manure may be spread within 50 metres of boreholes. These outstanding actions have been repeatedly pursued with both Fisher German and National Grid. As of 7 July 2026, no substantive responses had been received. In my submission, the continuing failure to address these agreed action points is inconsistent with National Grid's repeated assertion that it is engaging positively and constructively with affected landowners throughout the examination process.	The Applicant respectfully disagrees with the comment that they have not been engaging positively with the landowner. The Applicant has had a number of constructive meetings with the landowner, including most recently on 9 July 2026. At the meeting on 9 July 2026, answers to a number of the historic questions were provided verbally, with a follow up sent via email on 21 July 2026. Further answers are provided below. 1. The Applicant recognises that agricultural activities will continue on land adjacent to the Order Limits during construction. In accordance with recognised industry good practice, including the NFU's <i>Good Neighbour Initiative – Spraying Responsibly</i> guidance, the Applicant and affected landowners/occupiers will maintain appropriate communication regarding activities that may interact with one another. Where pesticide spraying is proposed on land adjacent to active construction areas, the landowner/operator will provide reasonable advance notification to the Contractor and will undertake spraying activities in a manner that avoids spray drift into active working areas. This will enable agricultural operations to continue whilst protecting the health, safety and welfare of the construction workforce and maintaining safe working practices. The Applicant does not have any powers to prevent the landowner undertaking spraying or other activities on neighbouring land. However, if the activity contained toxic or contaminated substances, the Applicant would anticipate the landowner would inform the contractor during construction, to ensure no harm is caused to construction personnel or apparatus. The Applicant will engage with landowner during construction, via the ALO, to manage and mitigate any such challenges. 2. The Applicant advised in the meeting on 9 July 2026 that footpath diversions are a matter to be dealt with in conjunction with the Local Planning Authorities. However, the Applicant will endeavour to provide further information on this point via email when there is a more detailed programme. At the site meeting, the Applicant showed the landowner the 7.6 Outline Public Rights of Way Management Plan [REP5-163] map. Paragraph 4.2.3 of the Public Rights of Way Management Plan: The proposed management regimes for PRoWs, as set out in Section 7 of this document, are based on the Proposed Alignment and information shown on the Works Plans (document reference 2.3) and current understanding of the construction programme. If any changes are required to the proposed measures or the final PRoW Management Plan, these would be addressed through the relevant change process detailed in Section 6 of this document. This would include discussions with the relevant LHA PRoW Officer and landowners prior to implementation. Further, in such cases where closure or stopping up of PRoWs not

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			listed in the relevant schedules of the draft DCO are required, the draft DCO (document reference 3.1), requires National Grid to obtain the consent of the relevant LHA and agree the necessary measures and arrangements with them. 3. Land has been allocated within the Order Limits for badger mitigation should it be necessary to close a main badger sett. The status of all badger setts that need to be closed would be confirmed during the detailed design and construction phase to ensure that sett closures and construction of artificial setts is based on current and up to date information to inform any licence applications. If it is necessary to close a sett and it is found that that clan has no safe suitable alternative setts in the area, then an artificial sett would need to be constructed. Whether or not badger mitigation is required within this specific land parcel and the full details of what these works will entail will only be known following detailed design. The Applicant will continue to engage with the landowner on this matter as further information becomes available. 4. Under the DCO, the Applicant is required to prepare a detailed drainage scheme approved by the Local Planning Authorities. Details of the drainage proposals can be found within Table 6.1 (Commitment AS05) within the Outline Code of Construction Practice Revision F. 8.2 Drainage Strategy (Revision C) [REP6-095] has also been prepared. This Strategy will be used as a basis and further developed into a Surface Water Management Plan by the Main Works Contractor(s) which is substantially in accordance with 8.2 Drainage Strategy (Revision C), detailing how runoff across the site will be controlled and how any off-site effects will be managed and mitigated. 5. This point remains outstanding but is under review with a position statement to be issued in due course.
		Following the Compulsory Acquisition Hearing, I have attached a copy of the Heads of Terms for the planners to review. Unfortunately, these Heads of Terms are incorrect. Despite informing National Grid at the Compulsory Acquisition Hearing of the correct land ownership structure, discussing the issue again at two subsequent meetings, and providing annotated maps by email, National Grid has still been unable to amend the Heads of Terms to reflect the correct ownership.	The Applicant acknowledges that discussions have taken place regarding the relevant landownership arrangements and that further information, including annotated plans, has been provided by the landowner. The Heads of Terms are draft documents intended to facilitate ongoing negotiations and remain subject to review and amendment as additional information is received and verified. As matters stand the documents reflect the status of ownership as recorded by the Land Registry. The Applicant continues to engage with the landowner and their representatives to ensure that the relevant land interests are correctly reflected and to progress voluntary agreement negotiations where possible. The Applicant does not agree that this matter demonstrates a failure to engage. Rather, it reflects an ongoing process of reviewing landownership information and refining draft documentation as discussions progress. The Applicant remains committed to working with the landowner to resolve any outstanding discrepancies and to ensure that future iterations of the documentation accurately reflect the agreed position.
Chris Whitfield	[REP6-185]	National Grid's proposed pylon alignment will inflict profound and irreversible harm on the historic core of Ardleigh. Our village crossroads contains a dense, sensitive cluster of Medieval listed buildings and the Grade II star listed Church of St Mary's, all protected within a designated Conservation Area. Under National Policy Statement EN-1, the Applicant is required to minimise harm to the historic environment. National Grid assesses the impact on St Mary's Church as 'Lower	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1.

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		Less Than Substantial Harm.' This is considered to be downplayed and that there would be substantial harm due to the 50 metre pylons encircling the village and cutting off the historic context of St Mary's Church. The revised visualisation 7.12 c shows with a single dotted green line how the cable array would be seen above the medieval listed buildings and crossing the street behind the Church. 7.12 e shows how the array would be visible to the east of the crossroads. The absence of physical damage to the bricks and mortar should not be confused with the scale of visual destruction to the setting. [Applicant note: this submission has been summarised]	
		National Grid has failed to prove that a less harmful alternative route is impossible. The Applicant has already conceded that undergrounding cables is necessary through the adjacent Dedham Vale National Landscape. However, they have failed to provide a robust, transparent justification as to why the East Anglia Connection Node cannot be located elsewhere. The concentrated heritage at the centre of our village deserves protection. The cumulative impact of the massive new substations, the haul roads, and this arc of pylons will completely obliterate the historic character of this rural parish. [Applicant note: this submission has been summarised]	At the initial siting stage we obtained information on permanent land requirements from the contracted customers and factored this into the process to ensure that there was potentially enough space for multiple substations. The securing of consent for the two other substations for North Falls and Five Estuaries rests with their respective developers and similarly it rests with Tarchon to site and secure consent for its convertor station. The Project responds to a two-part need case to reinforce boundary transfers with a Norwich to Bramford to Tilbury double circuit connection and to connect the Essex Coast Generation Group. An integrated solution is one of many factors in reaching a preliminary preferred route; providing the connection with less infrastructure than separate projects (see further details in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study) [APP-356]. This required the identification of an EACN location which is summarised in overview with further detail in 5.15 Design Development Report [APP-122] and 6.3 Environmental Statement Chapter 3- Alternatives [APP-127]. The general location of a connection point reflects the location of the generation sources and the Transmission System. The independent NESO (then ESO) identifies the general location and issues Connection Offers which, once signed by the customer, are responded to by the Applicant who completes detailed siting (either on the existing Transmission System or at a new location linked by new 400kV connections) and routeing (of the 400kv connection if required) to identify an optimum solution. EACN (general siting) is set out in page 22–23 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and provides the reasoning for the selection of the Tendring Peninsula for the connection in view of, at the time, the North Falls and Five Estuaries wind farm connection agreements, due to the location of these generators and the customer connection works indicating the general location for connection. The conclusions from page 23 were <i>‘Overall the appraisal concluded that options associated with Clacton landing points and EAC nodes in Tendring District are preferred. These locations, in combination with the required onshore connections from the node to the NTS, are more compliant with Holford and Horlock routeing and siting guidance, in particular by offering greater potential to avoid and minimise effects on AONBs than would be the case with Felixstowe landing points.’</i> Potential sites were identified throughout the Tendring Peninsula with Zone A (combining a number of adjacent blocks for potential development) emerging as being preferred following a selection process. This is then subject to ongoing back-check and review. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. In making decisions the Applicant notes that:

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			• Siting and routeing should consider the effects and costs of 400kV connection infrastructure as well as how that influences the customer connection infrastructure and make a balanced decision. • Connections closer to the coast require two points of connection to the Transmission System. • The absence of nationally designated landscapes means the strong starting presumption for overhead lines (NPS EN-5) for connections on the Tendring Peninsula is not reversed. As a result, any site, beyond where they may impact the setting of a Nationally Designated landscape, is expected to require parallel 400kV overhead line connections. The preliminary location for the EACN Substation (Zone A) was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] in Section 6 as part of an iterative process. That document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. The selected location east of Ardleigh balances the effects arising from 400 kV connection corridors and substation for the Applicant and the needs of those with signed connection agreements who will connect at the EACN. It took into consideration the installation of one of the Applicant's connections by underground cable to Zone A but the likely need for an onward double overhead line down the Tendring Peninsula to progress sites closer to the coast. Given the potential for colocation of customer infrastructure, sites were not progressed if they were individually too small and were subsequently clustered into zones. Zone A had the scale to potentially accommodate both the Applicant's and some of the other customer infrastructure. In terms of the overhead line route, as detailed at paragraph 6.5.43 of 5.15 Design Development Report [APP-122] the Applicant reviewed options both further north and south Ardleigh but they were less preferred for the main reasons set out below: • <i>Route options to the south of Ardleigh have the potential to be straighter in parts and more direct but would unavoidably oversail a scheduled monument and transfer some general amenity effects to other (albeit fewer) residential areas. Some oversail of gardens and crossing of, and potentially pylons within, local wildlife sites of Springhead Corner Meadow and Manor House Meadow would be unavoidable, and acquisition of residential or commercial property would be required to develop a route with appropriate clearances. Even overcoming these challenges, a crossing of the reservoir is not considered possible due to the extent of made ground to either side following mineral extraction, and the location of other existing and planned water bodies coupled with the challenges to system performance from the depth of underground cable installation.</i> • <i>Route options to the north of the 2024 preferred draft alignment would follow the current proposed overhead line to around TB11 before diverting to the north of the reservoir. This would transfer effects to other (albeit fewer) residential areas but increase socio-economic impacts (stud farm and vineyard, among other affected uses), increase the potential for effects on the National Landscape through reduced separation, and require more extensive removal of trees to achieve appropriate clearances.</i> Regarding the cumulative effects, 6.17 Environmental Statement Chapter 17

Party	PINS ref	Third party comment	Applicant's Response
			Cumulative Effects [Revision B] and 6.17.1 Cumulative Effects Response Update [Revision B] provide a robust assessment of inter-project cumulative effects which includes all known development around the proposed new EACN Substation. The assessment concludes that there will be no residual significant effects on the historic environment (which include consideration of historic character) in this area.
Elizabeth Reynolds	[REP6-197]	After five years of planning applications, surveys and consultations, my husband and I finally obtained planning permission for our home. Because our property is within the Green Belt, we had to satisfy extremely strict planning requirements The defining feature of our home is its position within the valley and the floor-to-ceiling glazing throughout the house specifically designed to capture panoramic views. Under the current proposal, one pylon is expected to stand approximately 80 metres from our bedroom window, with pylons positioned on the highest ground on both sides of the valley. The visual impact on our home, and on the surrounding countryside, will be severe, overwhelming and permanent. In addition, a haul road is proposed metres from our bedroom window. This will bring years of heavy construction traffic, noise, vibration, dust, lighting and continual disturbance. Even after construction has finished, we will be left living alongside overhead transmission lines, with the ongoing hum and crackle that high-voltage infrastructure can generate, particularly during damp weather. This represents a substantial and permanent loss of residential amenity in what is currently a peaceful rural environment. [Applicant note: this submission has been summarised]	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 2.1 and Table 3.1.
		During construction of our home, our basement flooded every single day until the structure became watertight. Before building began, extensive ground investigations were undertaken, including boreholes extending significantly deeper than the basement itself, and no groundwater issues were identified. However, once excavation started, the reality was very different. Today, two permanent pumps operate continuously to manage groundwater beneath our home. Ivy Barn Lane regularly floods because of its location within the valley, yet I remain unconvinced that the cumulative effects of additional hardstanding, access roads and construction activity on local drainage have been properly assessed. No one has assessed the potential impact these works could have on our basement or on the groundwater conditions surrounding our property.	The Applicant provides comments on this in 8.5.13 Applicant's Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 3.1. It is re-iterated that all rainfall runoff from hardstanding areas created by the Project, will be managed at source, with a range of measures included in the design to capture, convey and store/attenuate these flows, to ensure no contribution of flood risk to existing flooding sensitive areas. The drainage measures that will be put in place will achieve compliance with both national and local standards for SuDS and will be subject to scrutiny by the relevant Lead Local Flood Authority. Effects on groundwater levels and flows are presented in 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181], with a range of measures and controls identified and secured to avoid or mitigate effects, which are set out in 7.2 Outline Code of Construction Practice [Revision G].
		Reluctantly, we have attempted to sell our home. However, around 80% of prospective buyers have lost interest once they became aware of the proposed pylons. We received one offer from buyers who were aware of the proposal and submitted a substantially reduced offer because they believed the pylons would significantly affect the property's value. They later withdrew altogether, explaining	The Applicant acknowledges the concerns expressed regarding the potential effects of the Proposed Development on the property, the difficulties described in relation to the sale of the property, and the personal impact that prolonged uncertainty may have on affected individuals and families. The Applicant recognises that major infrastructure projects can give rise to concerns regarding property values, health and wellbeing, and quality of life, and these matters have been considered as part of the application process.

Party	PINS ref	Third party comment	Applicant's Response
		that they simply did not want to live next to the proposed infrastructure. These experiences clearly demonstrate how the proposal is perceived by ordinary members of the public. The uncertainty surrounding this scheme, together with the prospect of living with these permanent changes, has had a profound effect on my mental health and that of my family. We now face the possibility of either losing a substantial proportion of everything we have invested in our home or remaining trapped in a property that has been fundamentally changed for years to come. Where homeowners are acknowledged to be significantly affected, National Grid should be required to offer meaningful compensation, including purchasing properties at their unaffected market value where appropriate. [Applicant note: this submission has been summarised]	The Applicant notes the experiences described regarding prospective purchasers and perceived effects on property value. However, property values are influenced by a range of factors and the Applicant is not able to verify the causes of individual purchasing decisions. Compensation entitlement is governed by the statutory compensation code and applicable legislation. Where the relevant statutory tests are met, affected parties may be entitled to pursue compensation through the established legal framework, including statutory blight or other applicable heads of claim. The Applicant does not operate a discretionary property purchase or hardship scheme. The Applicant also acknowledges the concerns raised regarding mental health and wellbeing. The Environmental Statement recognises that uncertainty and concerns associated with major infrastructure projects may give rise to stress and anxiety for some individuals. The Applicant has sought to reduce impacts through the iterative design process, mitigation measures and ongoing engagement with affected parties. Whilst the Applicant recognises the concerns expressed, it does not agree that the circumstances described justify a requirement for the compulsory purchase of properties at unaffected market value outside the statutory framework established by Parliament. Compensation and blight matters must be considered in accordance with the applicable legislative provisions and on the facts of each individual case.
		There are also wider environmental concerns. Established hedgerows are proposed for removal despite their importance to local wildlife and the character of the landscape. We regularly see red kites, buzzards and many other species around our home, and I am deeply concerned about the cumulative ecological impacts.	The Applicant has made commitments to further minimise the loss of hedgerow through detailed design. Where impacts to hedgerows are unavoidable mitigation measures have been set out within the 7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Outline Code of Construction Practice [Revision G]. Where practicable, all vegetation removal (including hedgerows), will be undertaken outside of the nesting bird season of March to August. However, where this is not possible, an Ecological Clerk of Works will undertake a nesting bird check in advance of any removal works to ensure no direct effects on any active bird nests. The Applicant is committed to providing replacement planting on completion of works to ensure no lasting negative effects on flora and fauna. The Applicant is also committed to delivering 10% biodiversity net gain as set out in 7.1 Biodiversity Net Gain Report [Revision B], which would ensure that the Project makes a real commitment to nature recovery in the region.
		Traffic impacts also appear to have been underestimated. It takes very little for congestion on the A12 to divert traffic through surrounding villages. During construction, the additional volume of construction traffic has the potential to cause significant disruption across the wider local road network, affecting residents well beyond the immediate route of the scheme. Confirmation should be sought whether harmful alternatives have genuinely been explored. [Applicant note: this submission has been summarised]	An assessment of the temporary impact of construction traffic associated with the Project has been undertaken for the SRN under the road-only strategy within Section 7.6 of 7.11 Transport Assessment [APP-333]. Table 7.1 summarises the forecast changes in traffic flow by direction on segments of the A12 due to the Project in the peak construction year and within the AM and PM peak hours. The change is shown for total traffic flow and for HGVs. For the A12 it was identified that the project would result in an increase in HGVs of between 4 and 35% and total traffic of between 1% and 9% in the AM and PM peak hours, which is not deemed significant for a road forming part of the Strategic Road Network. It should also be noted that these forecasts represent the worst-case peak daily construction activity for the Project along the A12 and are estimated to be short-term occurring over a one-week period. Outside of this peak activity, the Project is unlikely to result in any significant impact on the network capacity along the A12. Junction modelling at sensitive junctions has also been undertaken along the A12 where the SRN connects to the Primary Access Routes used by construction traffic to access the Project. This includes the following junction:

Party	PINS ref	Third party comment	Applicant's Response
			• Site 40 - A12 Severalls Interchange • Site 46 - A12 J26 Eight Ash Green Interchange • Site 62 - A12 J15 Webbs Farm Interchange. It was found that at Site 46 and Site 63 the junctions would continue to operate within capacity in the AM and PM peak hours during the peak construction activity for the Project. At Site 40, it was identified that the majority of arms would generally operate within capacity with no significant queues or delays. Although the junction would likely experience additional queues and delay on the Via Urbis Romanae southern arm in both the AM and PM peak hours. This capacity issue is however predicted to occur as a result of the natural background traffic growth in the area and from traffic flows associated with other developments. The temporary construction flows associated with the Project would therefore have a marginal impact on the performance of the junction. Given the minimal increase in total traffic as a result of the Project, and the short duration of the peak construction activity on the A12, it is considered unlikely that motorists would use alternative routes through adjacent villages given minimal delay is expected along the SRN.
		Offshore transmission routes have been selected elsewhere because the visual impact on communities was considered unacceptable and it is not clear why the same level of consideration has not been afforded to the communities affected by this proposal. [Applicant note: this submission has been summarised]	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement 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. Offshore transmission routes have been selected elsewhere due to the balance of factors such as cost, environmental impacts and capacity requirements which all must be taken into account alongside the context of policy and regulatory environments. The projects that have progressed an offshore transmission route were not selected as such on the basis of visual impact alone. 7.19 2023 — Strategic Options Backcheck and Review [APP-357] Section 5 Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations.
		Full and careful weight should be given to the cumulative impacts on residents, residential amenity, landscape character, ecology, flooding risk and the long-term consequences for families like ours. We accepted the restrictions that came with building in the Green Belt because we understood the importance of protecting this landscape. We invested everything we had into creating a home that respected its surroundings and was designed around the very views that are now under threat. I simply ask that our family is given the same consideration and protection that the planning system required of us.	Regarding the cumulative effects, 6.17 Environmental Statement Chapter 17 Cumulative Effects [Revision B] and 6.17.1 Cumulative Effects Response Update [Revision B] provide a robust assessment of inter-project cumulative effects which includes all known development. An update is submitted at Deadline 7.

Party	PINS ref	Third party comment	Applicant's Response
		We are not asking for special treatment. We are asking for fairness, for genuine consideration of less harmful alternatives, and for recognition of the devastating impact this proposal will have on our home, our future and our lives. [Applicant note: this submission has been summarised]	
James Cartlidge MP for South Suffolk	[REP6-207]	My contention is straightforward, and in my view, very serious from a planning process point of view. It is a fundamental principle of planning that the process must not be predetermined. However, throughout the planning process for Norwich to Tilbury pylons, National Grid have only ever seriously considered one option - pylons. From the very outset, my constituents visiting parish rooms for National Grid engagement sessions on Norwich-Tilbury were only ever shown one option, a single swathe of pylons. At those sessions, my constituents would ask – what about going offshore? They were told by National Grid staff that offshore alternatives were ‘not possible’. And yet, billions of pounds have been spent elsewhere carrying electricity offshore in the United Kingdom, at a cost of billions of pounds to billpayers, such as the Western and Eastern Links. My constituents may have found the dismissal of any other option than pylons as more understandable if they had been presented with evidence for each of the options. In fact, no such comparative data was ever publicly presented by National Grid. To underline this point, at a meeting on Teams organised for MP, National Grid and Ofgem, on Monday 18th July 2022, I asked National Grid to share their detailed evidence of alternatives to pylons and they said they would provide me with such information ‘in a few months’. Why not immediately, I asked? Because they hadn’t undertaken any such assessment and would have to go away and do the work. As this point is so critical to my argument that the process has been predetermined, I repeat what I said in Parliament the day after that meeting, and I quote: “National Grid said yesterday that given the concern about what is happening in Scotland and the sense of unfairness, it would publish a detailed assessment of an offshore option later in the summer. Why will that be published later in the summer? Because it has not been done. There has been no detailed assessment of an offshore option.” Indeed, there had been no detailed assessment of any other option than pylons. This illustrates a key failure of National Grid’s consultation: how could they have possibly consulted on any alternatives to pylons if they hadn’t done the work? And how could they have decided pylons were the best option without such an assessment? Consequently, after I repeatedly demanded a detailed look at all transmission options for this proposal, in 2023 National Grid ESO (now NESO) agreed to undertake an expert and independent assessment of all viable options for Norwich to Tilbury, known as the ‘East Anglia Study’.	The Applicant provides comments on this in 8.5.13 Applicant’s Response to the Oral Submissions Made at Open Floor Hearing 4 [REP6-119] in Table 2.1 and Table 3.1.

Party	PINS ref	Third party comment	Applicant's Response
		Bearing in mind that ESO was then part of National Grid, clearly expert, and wholly neutral on the proposal in question and certainly not inclined against pylons, approaching the matter with an open mind ESO found that a fully undergrounded HVDC route was cheaper than pylons over the lifetime of the project, assuming a 2034 baseline – such a baseline being necessary to take into account the cost advantage enjoyed by the pylon option, given that so much of the preparatory work has already been done. National Grid ESO admitted to me that the cost competitiveness of underground HVDC surprised them and was primarily caused by lower ‘constraint payments’. I would stress that these findings were retested repeatedly by ESO’s senior engineers and found to be fully justified. In addition, ESO concluded that the underground onshore HVDC proposal is ‘technically feasible in the timescales that the capacity is needed’. Finally, their assessment did not include the huge benefit to the countryside of underground HVDC, not least the lack of permanent despoilment – to emphasise that point, a huge strategic water pipe is being built through my constituency by Anglian Water to assist with drought, and whilst its construction has been disruptive, I’ve received no correspondence at all because the all the infrastructure is buried, and the landscape made good. In Germany, underground HVDC is the legal default; this is not a ‘crank’ option, and actually avoids the vastly wider trenches required to underground AC cabling through protected landscapes. To conclude, I must object to these proposals for Norwich to Tilbury because the applicant has never seriously entertained any other option, and in my opinion has been predetermined throughout. Had they considered other options from the outset, they could have treated my constituents fairly and presented the full facts on all options. Had they done so, they would have discovered the fact that underground HVDC would be cheaper over the project lifetime and I would urge the inspectorate even at this stage to reject the plan, so that a more open minded reconsideration can be undertaken.	
Paul Lanham	[REP6-223]	The proposed access route affects my family home, as it would enter through the front entrance to [Redacted] and pass within only a few metres of my front door before continuing through the farmyard. This is the place where my family live and where my children and grandchildren visit. Whether the proposed access is temporary, permanent or occasional, the impact on my family is exactly the same, as it affects our privacy and security, as well as creating safeguarding concerns for our grandchildren. It fundamentally changes the enjoyment of our home. For more than two years we have lived with the uncertainty surrounding this proposal. The stress and worry associated with the possible loss of our home environment and our farming business has had a significant impact upon our mental wellbeing. [Applicant note: this submission has been summarised]	The Applicant understands the concerns raised by the AP, which were raised and responded to at the CA hearings. The Applicant would further refer the AP to the written response to REP6-224 in 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 8.4.16, the letter dated 18th June 2026 to the AP, and the response following the oral response given at CAH2 found in document 8.5.6 page 19/20. The Applicant confirms that ongoing discussions with the AP’s land agent included a meeting on 15th July 2026. Financial information from the AP to assist mitigation strategies is still outstanding from May 2026.

Party	PINS ref	Third party comment	Applicant's Response
		The impact on our farming business [<i>Redacted</i>] is not simply agricultural land, but a long-established working family farm which has been built up over more than fifty years. The proposals threaten every part of that business. The proposed access would pass directly through our working farmyard and within very close proximity of our commercial turkey enterprise. Biosecurity is fundamental to the operation of that enterprise. We have already received written confirmation that if the proposed access arrangements proceed as currently planned, we will lose our turkey enterprise. The proposals also affect grazing land essential to our cattle enterprise, making it commercially unviable. In addition, the proposed pylons and overhead lines would have a devastating impact upon our fishing lake business, which represents a significant income stream for the farm. Taken together, the proposals threaten all three of our principal income streams. If the proposals proceed in their current form, the future viability of Dukes Farm is placed in serious doubt. [Applicant note: this submission has been summarised]	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 commitments to seek to avoid or reduce impacts where reasonably practicable.
		A less harmful alternative exists. For approximately two years we have identified and promoted an alternative access route which would significantly reduce the impacts upon our home and our farming business. Plans showing this alternative have been provided to National Grid and Fisher German. Despite repeated requests, we have never received any explanation whatsoever as to why this alternative cannot be used. We are not saying National Grid cannot access the land. We are asking why they need to acquire rights through our home and farm when a significantly less harmful alternative exists.	The Applicant refutes the allegation that no explanation has been given regarding alternative routes and refers the AP to the response given at CAH2, and in 8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 pages 19/20 [REP4-301] which detail the constraints of the route around the AP's land holding.
Clare Lanham	REP6-189	The impact on our home During Open Floor Hearing 4, I explained that this proposal does not simply affect agricultural land. It affects our home. The proposed access route would enter through our main residential gateway and pass within only a few metres of our front door before continuing into the farm. This is not a remote corner of a field. This is where my husband and I are raising our children. It is where they play. It is where they should feel safe and secure. Whether the proposed access is temporary, permanent or occasional, the impact on our family is exactly the same. The issue is not how often the access may be used. The issue is that rights are being sought through our home environment at all. As a mother, I have serious safeguarding concerns. I have concerns regarding privacy and security. The proposal fundamentally changes how we are able to live in and enjoy our own home. For more than two years we have lived with uncertainty over whether access rights will be imposed through our home. That uncertainty has had a significant impact on our family and our mental wellbeing.	The Applicant recognises that the proposals are of great significance to this AP and her family and understands the strength of feeling expressed in the representation. The concerns raised have been carefully considered. Having reviewed the matters again, however, the Applicant has no further substantive information to add beyond that already provided in its previous responses including that at Deadline 6 in relation to REP5-288 in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114] and under Question 2.6 of 8.31 Response to Rule 17 Letter received 14 July 2026.

A less harmful alternative exists

The point I keep coming back to is a simple one. We are not saying National Grid cannot access the land. We are asking why they need to access it through our home. For approximately two years we have consistently identified an alternative access route. That route uses the existing public highway directly to the field where the proposed pylon is situated and a gateway that National Grid already has permission to use. It avoids our residential entrance. It avoids our front garden. It avoids the safeguarding concerns. It avoids many of the privacy and biosecurity concerns. Most importantly, it avoids turning our family home into an access route. Despite repeatedly raising this alternative, National Grid has never provided us with any explanation whatsoever as to why it cannot be adopted.

The Applicant notes the AP’s concerns regarding the interaction between the proposed permanent access route and the property and has committed to keeping this under review as set out in the Additional Detailed Design Requests, at ADDR-91 at Appendix B of this document, Additional Detailed Design Requests. Noting that the alternative proposed route transfers the access route onto a third parties' land. In any case, the permanent access would only be subject to very occasional use.

Compulsory Acquisition

Although I was unable to attend Compulsory Acquisition Hearing 3, I have carefully considered the matters discussed. Having done so, I remain of the view that National Grid has not demonstrated that the compulsory acquisition of rights over our home is either necessary or proportionate. The Applicant has not explained why rights through our home are required when a significantly less harmful alternative exists. In addition, the continuing discussions regarding the possible relocation of the permanent access demonstrate that the current proposal cannot be regarded as the only available option.

The Applicant notes the AP’s comment and would direct the AP to the response given at CAH3 and in the written response in relation to REP5-288 in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**. Furthermore this has also formed part of discussions with the AP’s land agent. In short, the proposed alternative route lies outside the project Order Limits and affects a further two landowners. The proposed, permanent access route, which it is proposed would be used very infrequently for only 4x4 vehicles, follows the existing farm business entrance which accommodates HGVs to the agricultural businesses.

Transparency

Throughout this examination, we have repeatedly asked for information regarding the intended use of the proposed permanent access and the reasons why our alternative access route has not been accepted. We have never received any explanation whatsoever. As affected landowners, we believe we should have a clear understanding of exactly what rights are being sought over our home and why. Transparency is fundamental to the examination process, and it is disappointing that important information discussed during the hearings has not been shared with us despite our requests.

The Applicant refutes the allegation regarding lack of transparency and refers the AP to the response provided in relation to REP5-288 in **8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]**, and many meetings with the AP’s land agent the most recent of which was held in early July 2026.

Conclusion

My family has never sought to prevent the Norwich to Tilbury project from proceeding. We simply ask that it is delivered in a way that avoids unnecessary harm where a practical alternative already exists. I respectfully ask the Examining Authority to take into account the significant impact this proposal would have on our family home, our children, our privacy, our wellbeing and our farming business. Most importantly, I ask that careful consideration is given to the alternative access route that has been available throughout this process and for which no explanation has ever been provided as to why it cannot be used. For these reasons, I respectfully submit that National Grid has not demonstrated a compelling case for the compulsory acquisition of rights affecting [redacted], and I ask the Examining Authority not to recommend those powers in their current form.

The Applicant remains committed to continuing negotiations to mitigate the existing agriculture businesses. Discussions are progressing with the AP’s agent.

7.2 Applicant’s Response to Further Submissions That Were Not Given Orally at OFH4

7.2.1 A number of Deadline 6 submissions stated that they related directly to points raised at OFH4, or were submitted in writing in lieu of attending OFH4. These are provided below with the Applicant’s response. Other general Deadline 6 submissions – where it was not clearly related to OFH4 or another hearing - are responded to in **8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6.**

Table 7.2 Applicant’s response to matters raised in response to ISH2

Reference	Third Party Comment	Applicant’s Response
Sir Bernard Jenkin (MP) [REP6-235]	The Holford Rules, while not part of planning law, remain the best practice framework for decisions about overhead powerlines and in conjunction with National Policy Statement (NPS) EN-5 demand that the Dedham Vale National Landscape should be avoided altogether if possible. The Buxton submission confirms that feasible, technical alternatives to AC overhead powerlines and undergrounding have not been properly considered. It is possible that if policy had been properly applied, the route would not have impacted upon the Colne Valley at all or at least would have been undergrounded. The Project therefore fails the fundamental policy test and is not capable of approval.	The Holford Rules set out in paragraph 2.9.17 of National Policy Statement (NPS) EN5 (2024) state that applicants should (not must), <i>'avoid altogether, if possible, the major areas of highest amenity value...'</i> 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 [REP1-069] and 5.15 Design Development Report [APP-122]). 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]. The Applicant agrees with the statement that Paragraph 2.9.21 (NPS EN-5, 2023) and 2.9.22 (NPS EN-5, 2025) sets out that in a National Landscape the presumption in favour of overhead lines is reversed and “the strong starting presumption will be that the applicant should underground the relevant section of the line”, the Project is proposed to be underground cable through the National Landscape through to the EACN substation. NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to 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, even 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 (2024) and EN-5 (2014) 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 and other duties. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding, including at the Colne Valley. See also the Applicants Response to Villages

Reference	Third Party Comment	Applicant's Response
		Against Pylons REP 6-172 in relation to EN-5 interpretation at 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6. Paragraph 3.3.6 to 3.3.15 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out why the existing grid cannot be upgraded to the capacity required and therefore the only solution to address the deficits in capacity is new circuit infrastructure. Paragraph 3.3.16 to 3.3.42 then sets out the consideration of alternative options such as offshore and HVDC undergrounding for the Project. The Applicant also refers to its latest response to Pylons East Anglia's comments on the Needs Case, in Appendix E of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6.
	Apparently, NG is advancing an entirely new argument against DC undergrounding the entire route: that this would preclude access to the grid along the route for new developments, such as solar, batteries or industry. This was not part of the original purpose of N2T and, if advanced, it should be discounted. The ExA will be aware that paragraph 2.9.21 (NPS 2023)/2.9.22 (NPS 2025) sets out a preference for avoiding a National Landscape unless it "cannot feasibly be avoided". Overhead lines are not an appropriate solution for Essex and East Anglia as a whole, and harm to the Dedham Vale can be avoided by upgrading the existing grid using high-temperature, low-sag converters, an offshore solution or HVDC undergrounding for the entire Norwich to Tilbury route.	The Applicant is clear the HVDC systems require additional converter stations and AC substations to make connections along the route, and only if multiterminal HVDC systems are specified. The AC system can accommodate connections at any location on the entire system, either by connection into existing substations or by establishment of new substations. This does not preclude the use of HVDC systems but does limit the ability of connections to the HVDC system. As stated in para 3.3.28 page 38 & 39 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] <i>"The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service."</i> The lack of HVDC circuit breakers is an issue associated with making further connections to HVDC systems, as the Applicant has set out previously. this is not an issue with AC systems where AC circuit breakers protect the system from generation to business and consumers. The Applicant also refers to its latest response to Pylons East Anglia's comments on the Needs Case, in Appendix E of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [Revision A].
	The Applicant's choice of location for EACN, which remains unjustified, causes enormous harm to the Dedham Vale and to the surrounding areas because of the route deviation required to reach it. This solution was not chosen as part of a strategic approach to the required infrastructure to support renewables, but reflects an ad hoc approach driven by a regulatory regime, which everyone now agrees is discredited. Given that HVDC undergrounding may be just as feasible on cost and technical grounds, it is unacceptable that NG have not assessed this option. It is also perplexing that the option NG have apparently assessed and costed is the idea of HVDC undergrounding just under the Dedham Vale. Who proposed this idea? Nobody serious, as far as any of the MPs is aware. Why has NG assessed this idea at all, except as an 'Aunt Sally'?	At the initial siting stage the Applicant obtained information on permanent land requirements from the contracted customers and factored this into the process to ensure that there was potentially enough space for multiple substations. The securing of consent for the two other substations for North Falls and Five Estuaries rests with their respective developers and similarly it rests with Tarchon to site and secure consent for its convertor station. The Project responds to a two-part need case to reinforce boundary transfers with a Norwich to Bramford to Tilbury double circuit connection and to connect the Essex Coast Generation Group. An integrated solution is one of many factors in reaching a preliminary preferred route; providing the connection with less infrastructure than separate projects (further details found in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]). This required the identification of an EACN location which is summarised in

Reference	Third Party Comment	Applicant's Response
	EN-5 also states that in a National Landscape the presumption in favour of overhead lines is reversed, and that “the strong starting presumption will be that the applicant should underground the relevant section of the line” (2.9.21 NPS 2023; 2.9.22 NPS 2025). This brings us to the Colne Valley.	overview with further detail in the 5.15 Design Development Report [APP-122] and 6.4 Environmental Statement Chapter 4 - Project Description [Revision B]. The general location of a connection point reflects the location of the generation sources and the Transmission System. The independent NESO (then ESO) identifies the general location and issues Connection Offers which, once signed by the customer, are responded to by the Applicant who completes detailed siting (either on the existing Transmission System or at a new location linked by new 400kV connections) and routeing (of the 400kV connection if required) to identify an optimum solution. EACN (general siting) is set out in page 22–23 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and provides the reasoning for the selection of the Tendring Peninsula for the connection in view of, at the time, the North Falls and Five Estuaries wind farm connection agreements, due to the location of these generators and the customer connection works indicating the general location for connection. The conclusions from page 23 were ‘Overall the appraisal concluded that options associated with Clacton landing points and EAC nodes in Tendring District are preferred. These locations, in combination with the required onshore connections from the node to the NTS, are more compliant with Holford and Horlock routeing and siting guidance, in particular by offering greater potential to avoid and minimise effects on AONBs than would be the case with Felixstowe landing points.’ Potential sites were identified throughout the Tendring Peninsula with Zone A (combining a number of adjacent blocks for potential development) emerging as being preferred following a selection process. This is then subject to ongoing back-check and review. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. In making decisions the Applicant notes that: • Siting and routeing should consider the effects and costs of 400kV connection infrastructure as well as how that influences the customer connection infrastructure and make a balanced decision. • Connections closer to the coast require two points of connection to the Transmission System. The absence of nationally designated landscapes means the strong starting presumption for overhead lines (NPS EN-5) for connections on the Tendring Peninsula is not reversed. As a result, any site, beyond where they may impact the setting of a Nationally Designated landscape, is expected to require parallel 400kV overhead line connections. The preliminary location for the EACN Substation (Zone A) was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] in Section 6 as part of an iterative process. That document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. The selected location east of Ardleigh balances the effects arising from 400 kV connection corridors and substation for the Applicant and the needs of those with signed connection agreements who will connect at the EACN. It took into consideration the installation of one of the Applicant's connections by underground cable to Zone

Reference	Third Party Comment	Applicant's Response
		A but the likely need for an onward double overhead line down the Tendring Peninsula to progress sites closer to the coast. Given the potential for colocation of customer infrastructure, sites were not progressed if they were individually too small and were subsequently clustered into zones. Zone A had the scale to potentially accommodate both the Applicant's and some of the other customer infrastructure. 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. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
	2.NPS EN-5 also sets out an expectation that even residual impact to the Dedham Vale is unlikely to be acceptable in planning terms. EN-5 at para 2.9.12 states: "in nationally designated landscapes... even residual impacts may make an overhead line proposal unacceptable in planning terms." EN-1 sets out the general expectation that development consent should only be granted where the proposal is acceptable in planning terms, yet these proposals will cause significant harm to the Dedham Vale. This is not a contentious matter. National Grid recognise and document expected harm to the Vale in their submissions, accepting that pylons will be widely visible across it. NG greatly downplay it. In the absence of proper consideration of the feasible alternatives, the fact that it is admitted to be more than merely residual harm undermines the credibility of the application.	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 Project 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. 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. Addressing the specific comment regarding avoiding the National Landscape, as described in 6.3 Environmental Statement Chapter 3 - Alternatives [Revision B] the Project routeing at the Strategic Options Stage of the assessment focused on whether the Bramford to EACN Substation connection should route directly through the Dedham Vale National Landscape (using underground cables within the National Landscape) or take a longer route around it via the Twinstead Tee area. A decision was taken by the Applicant to adopt underground technology through a more westerly part of the Dedham Vale National Landscape, achieving greater separation from sensitive ecology receptors and from areas of particular focus for National Landscape visitors.

Reference	Third Party Comment	Applicant's Response
		Routes avoiding the National Landscape by passing north of Colchester presented significant additional challenges, including greater technical complexity with multiple constrained sections at Layham, Boxford, and Lamarsh Lane, increased construction complexity, and the need for additional crossings of existing infrastructure such as the proposed Bramford to Twinstead overhead lines. Moreover, routes north of Colchester may still result in adverse effects on the setting of the National Landscape. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape. It is considered that permanent detrimental effects on the environment, landscape and recreational opportunities within the National Landscape have been avoided through undergrounding and careful consideration of routeing and siting through the National Landscape. An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study (Revision B). The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. Whilst the Environmental Statement reports significant effects on the special qualities of the National Landscape during construction, once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in Table A13.1.3 in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [Revision B]. NPS EN-1 provides that there is a critical national priority for the provision of nationally significant low carbon infrastructure. As an electricity grid infrastructure project, the Project qualifies as CNP Infrastructure under paragraphs 4.2.4 and 4.2.5 of EN-1. On the basis of the above and the clear and compelling need for the Project it is considered exceptional circumstances therefore exist to justify the Project in the Dedham Vale National Landscape. As demonstrated by the need case, the Project would be in the public interest. It is considered that the Project would be in compliance with this test.
	3.The Colne Valley meets the National Landscape tests. There have been two landscape studies commissioned in the Colne Valley by my constituents, covering the area between Fordham and Aldham. These, and the	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

Reference	Third Party Comment	Applicant's Response
	Applicant's landscape consultant's study, conclude that there is widespread harm to this area. NPS EN-5 makes clear that such considerations are not confined to nationally designated landscapes and should be assessed on a case-by-case basis. Having regard to the identified landscape sensitivity, the concentration of significant landscape and visual effects, the strategic importance of the Colne Valley and Roman River corridors, and the provisions of NPS EN-5, this appraisal concludes that <i>'there is a reasonable evidential basis for further consideration of localised undergrounding within this section of the route as a means of reducing landscape and visual effects'</i>. [Applicant note: this submission has been summarised]	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 33-35) and also Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [REP6-115]. 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 35-44).
	The respondent considers that the Colne Valley has qualities comparable to those of a National Landscape. Reference is made to analysis submitted by Pylons East Anglia which concludes that the area meets the six criteria associated with National Landscape designation: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage and cultural heritage. Comparisons are drawn with the adjoining Dedham Vale National Landscape, citing shared characteristics including river valley landscapes, ancient woodland, historic villages and churches, intact field patterns and significant archaeological interest. [Applicant note: this submission has been summarised]	The Applicant notes the comment made and confirms a response has been provided to the analysis submitted by Pylons East Anglia in Appendix E of 8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6.
	The respondent highlights the recreational and public value of the Colne Valley, including the Essex Way, Hillhouse Wood and Woodland Trust land at the Fordham Hall Estate. These assets are cited as evidence that the landscape is widely used, valued and enjoyed by the public, and that its special qualities extend beyond professional landscape assessment. [Applicant note: this submission has been summarised]	The Applicant agrees that the Colne Valley is of relatively high landscape value as explained in ISH4. As a result of the matters set out in 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 takes the view that the strong starting presumption of transmission by overhead lines is the appropriate approach.
	The Colne Valley is integral to the setting of the Dedham Vale. The relationship between the two valleys is not merely visual or thematic but physically continuous. The Colne Valley forms part of the same wider green infrastructure and ecological network that extends toward the Dedham Vale, sharing tributary watercourses, woodland cover and hedgerow connectivity. A walker, cyclist or motorist moving through the countryside between Colchester and the designated landscape experiences the Colne Valley not as a distinct or separate place but as the immediate, continuous approach to the Dedham Vale, the landscape through which the transition from urban edge to nationally protected countryside is felt and understood. This matters because the statutory protection afforded to the Dedham Vale's setting under NPS EN-5 is not limited to land that is itself part of the wider Dedham Vale/ Stour Valley project area in a formal planning sense. It extends to any land that in fact shapes the experience, approach to and appreciation of the designated landscape. Where, as here, the adjoining undesignated valley shares the same landform type, the same woodland and watercourse structure, and the same historic settlement pattern as the designated landscape itself, the case that it materially contributes to that landscape's setting is considerably stronger than it would be for a generic or unrelated piece of countryside lying near a designation boundary.	The Applicant disagrees with the assertion that the Colne Valley is integral to the setting of the Dedham Vale as set out 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).

Reference	Third Party Comment	Applicant's Response
Carolyn Mason [REP6-182]	Additional supporting information: T Fairley and Sons [REP4-375] noted that the location of the East Anglia Connection Node (EACN) and associated connections result in a disproportionate burden on a small number of landowners, the Little Bromley and Ardleigh community, and the character of this landscape. Policy (EN1 and EN5) requires avoidance of best and most versatile land (grades 1, 2 and 3a) wherever possible. If EN1, EN5 and the Holford Rules had been followed, the routeing of the Project would not have identified a site for the EACN that is directly in the middle of the largest contiguous block of grade 1 best and most versatile land in the county. The response from the Applicant stated that best and most versatile land had been taken into account in route optioneering and sought to minimise impacts on best and most versatile land as far as practicable, including providing mitigation measures to reduce impacts on the soil resource and on agricultural activities. The location of the EACN has been based on a number of factors, including the potential for co-location of the North Falls and Five Estuaries substations and customer cable corridors. There is also a predominance of best and most versatile land within East Anglia and due to the geographical extent of the Project it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of best and most versatile land is considered necessary on the basis that there is urgent need for critical national priority Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. The Applicant claims there are no alternative sites ignoring: • Undersea • Brownfield sites • Coastal sites nearer Tilbury • Boxted airfield [Applicant note: this submission has been summarised]	The Applicant stands by the response to T Fairly and Sons [REP4-375] in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194].
	Best and most versatile land can never be restored, as the harm to the soil will cause severe, often irreversible degradation, as stripping topsoil exposes subsoil to erosion, destroys natural drainage and restricts root growth. The use of soil stabilising agents (as suggested by National Grid) is not recommended for best and most versatile land and usually violates UK planning regulations. [Applicant note: this submission has been summarised]	All land temporarily required would be reinstated in line with 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision D] including land required for haul roads. The Outline Soil Resource Plan also details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), and the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. The potential use of soil stabilisation would only be 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. Compensation claims (as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]) for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

Appendix A. Comments on Interested Parties' Responses to Hearing Action Points

Appendix A

Comments on Interested Parties' Responses to Hearing Action Points

A.1 ISH2 Action Point 27

Background to ISH2 Action Point 27

- A.1.1 Action Points from Issue Specific Hearing 2 (ISH2) [EV9-023] included Action Point 27 which stated:
- ExQ LV 1.28 and masterplans - Masterplans to be provided at the next deadline, with an agreed position in terms of compensation measures for residual effects on the specified landscapes by Deadline 5 (Wednesday 10 June).*
- A.1.2 The Applicant responded at Deadline 4 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, stating:
- 'The Applicant notes this action and is already engaging with the local authorities to provide a response to this request for Deadline 5 as confirmed during ISH2. It has not been possible to provide plans for Deadline 4 due to the limited timeframe and engagement required with the relevant local authorities. The Applicant has set out its position on the policy relating to landscape compensation in its response to LV1.28 and at ISH2, and the Applicant's approach to this action will be taken forward in that context'.*
- A.1.3 The Applicant subsequently provided an update at Deadline 5 in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]**, stating:
- 'The Applicant has proactively engaged with Local Planning Authorities to discuss this matter. Co-ordinated plans have been submitted in 8.4.12.2 Response to ISH Action Point 27 – Masterplans [Revision A]'.*
- A.1.4 At Deadline 5 the Applicant submitted plans in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**.
- A.1.5 At Deadline 6, a number of Interested Parties made submissions in response to the plans provided at Deadline 5. This document provides a further update in relation to the engagement which has continued with the relevant local authorities and seeks to address the comments in the submissions made at Deadline 6. A copy of the comments received from Interested Parties on this matter has been provided in Annex A.

A.2 Applicant's update at Deadline 6:

Overview

- A.2.1 The following update sets out the Applicant's progress and position in respect of settling landscape compensation measures at certain locations along the route of the Norwich to Tilbury Project to address the general observations made by Interested

Parties submitted to the ExA at Deadline 6. The Applicant considers these matters to fall into a number of themes including;

- concerns about the development of masterplans;
- criticism of the masterplans;
- that engagement has been insufficient;
- the landscape enhancements illustrated are generic;
- that landscape compensation is not deliverable;
- that there is no mechanism to secure landscape compensation measures; and
- that the effects of the proposals remain inadequately addressed.

A.2.2 The purpose of this response focuses on the possibility of landscape compensation measures at certain locations along the Norwich to Tilbury Project, the matter raised by the ExA in ExQ1 LV1.28.

Masterplans

A.2.3 The Applicant has produced visual plans to illustrate the various constraints and opportunities to address the ExA's requests set out in ExQ1 LV1.28. These were discussed during Part 3 of Day 2 at the ISH2 (29 April 2026) which clarified what was envisaged for the masterplans and set out in the transcript published for that hearing **[EV9-014]**. Without prejudice to the Applicant's position that there is no need or requirement for landscape compensation pursuant to the legal and NPS policy framework, the Applicant has sought to assist the ExA's consideration of location specific landscape compensation measures should such measures be recommended to and be deemed necessary by the Secretary of State. This matter was further heard at Issue Specific Hearing 4 (ISH4) on 25 June 2026 and is covered at 2.1 Item 5: Landscape and Visual Effects in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**.

Engagement

A.2.4 The Applicant has discussed its approach to constraints and opportunities with the relevant county and unitary authorities leading on this matter and considers those discussions to have been constructive as indicated by Suffolk County Council in their response **[REP6-166]**. These discussions have also included Babergh and Mid Suffolk District Councils who expressed a desire to be included. The engagement that took place up until Deadline 5 was set out in the Applicant's response to LV 2.17 b) in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**. The Applicant has not sought to define specific proposals, rather, it has developed an approach that would allow the possibility of funding further measures in due course in which authorities, landowners and other responsible organisations might participate in.

A.2.5 The Applicant subsequently published its response considering those discussions in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**. The approach sought to provide a consistent and common foundation to establish the scale of landscape compensation that might be considered appropriate by those relevant authorities in each location. It aimed to provide a balanced and proportionate approach to landscape compensation which the ExA and Secretary of State might

consider appropriate having regard to NPS EN-1 (2024) and EN-5 (2024) policy, and the key tests, namely that measures should:

- be relevant to planning;
- be necessary to make the proposed development acceptable in planning terms;
- be directly related to the proposed development;
- be fairly and reasonably related in scale and kind to the proposed development; and
- be reasonable in all other respects.

A.2.6 The Applicant acknowledges the comments made in the submissions that landowners have not been consulted on the illustrative opportunities shown within the plans. Given the purpose of the exercise, to respond to ExQ1 LV1.28 and Action Point 27, the Applicant did not seek to develop site-specific proposals or negotiate individual measures with landowners. The plans were developed as strategic opportunity plans only. Any future compensation delivery would be informed by engagement with landowners, and other relevant organisations and require all necessary agreements to be obtained. The intention pursuant to the proposed DCO Article covering landscape compensation, offsetting and enhancement, is for financial contributions to be paid to the relevant authorities who will be best placed to manage and co-ordinate delivery at the local level.

Generic Plans

A.2.7 The Applicant recognises that several Interested Parties have identified examples where opportunity areas overlap with existing initiatives or projects, established habitat management and specific organisations' landholdings. This reflects the fact that such locations already present opportunities for landscape enhancement and connectivity and does not indicate that the Applicant is claiming responsibility for, or ownership of, those existing initiatives. The opportunity plans contained in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** were necessarily indicative and did not intend to present something to be imposed on landowners. The opportunity plans were not intended to identify wholly new interventions at every location, nor to prescribe specific measures. Rather, they were prepared to demonstrate that opportunities exist within the relevant landscapes for enhancement, restoration, connectivity and environmental improvement, should compensation ultimately be considered necessary.

A.2.8 Furthermore, the plans were developed as a tool to aid the discussion about potential compensation outcomes - measures that relevant authorities, local landowners, communities and other responsible organisations would ultimately have a role in planning and delivering. Landscape Character Areas (LCAs) were considered, and the approach drew upon the recently published Local Nature Recovery Strategies (LNRS). These strategies were themselves developed through consultation by the responsible authorities and identify opportunities to improve the fabric of the landscape, support habitat connectivity and deliver outcomes that would be familiar to local communities and their representatives.

A.2.9 The inclusion of an area within an opportunities plan should not be interpreted as indicating that no existing activity is taking place there, nor that the Applicant proposes to replace, duplicate or override existing management objectives. Equally, the opportunity plans should not be interpreted as an exhaustive schedule of

measures, as any future compensation programme would necessarily be informed by further engagement. The Article in the draft DCO is drafted to allow the relevant authorities some flexibility over working up detailed proposals for delivery within the defined locations.

- A.2.10 Some concerns have been raised regarding the accuracy of the constraints plans. These plans are intended to bring together the environmental constraints identified by the Project for specific topics into a single document. They do not replace the detailed topic-specific drawings submitted as part of the Application, including the Project's arboricultural drawings. The Applicant notes that a number of comments have been made regarding veteran trees not being identified, however veteran trees would not be identified on the plans if they are beyond the existing study area for the Application.

Deliverability

- A.2.11 Comments about delivering local initiatives have also come through the discussions with the relevant authorities and for example have included;
- Additional support for the Waveney and Little Ouse Recovery (WaLOR) project in the Waveney Valley;
 - Funding to enable a more joined-up approach to support landscape and amenity across multiple developments in around Bramford and Burstall; and
 - Potential enhancements to publicly owned land in the vicinity of the proposed pylon route within Essex.
- A.2.12 Similarly, as pointed out by Charles Micklem **[REP6-183]**, landowners are well placed to help deliver such measures and are willing to do so because they understand the opportunity on their land. As Burstall Parish Council **[REP6-143]** set out, they already have a good sense of what could be achieved if compensation were provided. As a result, the Applicant's understanding is that such measures are not only capable of being delivered but there is also a willingness from Interested Parties to deliver them. Discussions have continued following ISH4 with those relevant authorities to try to draw the response to landscape compensation for the Examination to a conclusion.
- A.2.13 Several Interested Parties have suggested that, because no agreements are presently in place, the opportunities illustrated are also undeliverable. The Applicant does not agree. The opportunities plans were not intended to demonstrate that specific measures have already been agreed or secured. Rather, they were intended to demonstrate that there are realistic opportunities within the affected landscapes capable of being developed into compensatory measures. The Applicant notes that a number of Interested Parties have themselves identified potential measures and locations which they consider suitable for enhancement, as identified above. In the Applicant's view, this demonstrates both the existence of opportunities and a willingness among relevant stakeholders to participate in discussions should compensation ultimately be required.
- A.2.14 The Applicant further notes that relevant local authorities have identified opportunities to build upon existing landscape and nature recovery initiatives, including projects such as the WaLOR project. This demonstrates that there are established mechanisms and delivery partners already operating within the relevant areas through which compensation outcomes could be realised.

- A.2.15 The Applicant notes that a number of Interested Parties disagree with the characterisation of the opportunities plans as masterplans. The Applicant considers that the plans respond proportionately to the request made in ExQ1 LV1.28 and Action Point 27 by identifying constraints, opportunities and potential approaches to landscape compensation at a location-specific level. The plans were not intended to comprise detailed designs or implementation proposals, which would only be capable of development following further engagement with relevant authorities, landowners and other stakeholders.

Mechanism to Secure Landscape Compensation

- A.2.16 Should these measures be recommended by the ExA and their inclusion be approved by the Secretary of State, they will be secured through an Article that will form part of **3.1 Draft DCO [Revision G]**.
- A.2.17 A draft of that Article has been published in Appendix A of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. This has been shared for comment with those relevant authorities leading on this matter and updated in response to the comments received.
- A.2.18 The Article will enable funding to be provided to those relevant authorities in a one-off payment for them to distribute and realise locally acceptable compensation outcomes at each location in conjunction with landowners and other responsible organisations. The level of funding has been discussed with the relevant authorities for inclusion in the Article. The Article also sets out the geographic and temporal scope; criteria for eligibility; and other measures of governance to ensure propriety.
- A.2.19 In relation to the 'agreed position' referred to in Action Point 27, the Applicant has been working with the relevant authorities to agree the Article which contains the principles of the fund to deliver the landscape compensation, should the Secretary of State consider the measures necessary. The Applicant is content that the feedback received from Norfolk, Suffolk and Essex County Councils and Thurrock Council has been addressed. The Article included within the draft DCO at Deadline 7 has been updated to reflect the comments received.
- A.2.20 The Applicant considers that we have reached consensus on the criteria for eligibility, the Article includes a list of criteria which has been the subject of review by the relevant authorities. The criteria have been updated since Deadline 6 to include reference to maintaining and monitoring the landscape compensation, offsetting and enhancement measures.
- A.2.21 The geographical scope of the fund, which is shown in the plans accompanying the Article, has been outlined to and shared with the relevant authorities. The geographical extent of the fund was identified for the locations following engagement with the relevant authorities. For the locations within Norfolk, Suffolk and Essex counties, a 2 km buffer was established around the centre line of the pylons at each location, and the outer extent of the fund area identified by the associated administrative parish boundaries. For Thurrock Council, as there are no administrative parish boundaries, a 3 km area around the substation works has been established.
- A.2.22 The Applicant has engaged with each of the relevant county and unitary authorities in relation to the size of the fund in each location. The figures for each location have

been set out in the Article. Due to the proximity of the outer parish boundaries at Gipping Valley and Bramford locations, the fund allocation has been amalgamated.

Effects of the Project

- A.2.23 The Applicant notes that several Interested Parties reiterate concerns about the Project itself, including: the need for it, their preferred alternatives including requests for undergrounding and comments on the Waveney Valley Alternative, route selection, compliance with the Holford Rules, and the impacts of the Project, including effects on designated landscape, heritage assets and recreational receptors. These matters have been considered throughout the Examination and responses to these aspects have been provided and are addressed elsewhere in published responses. To avoid repetition, the Applicant does not address these matters any further in this response. Action Point 27 is concerned with the identification of potential compensatory landscape measures and opportunities rather than the reconsideration of route selection, alternative technologies or the principle of the Project. The Applicant therefore limits its response in this document to those matters and does not repeat its wider position on these issues.
- A.2.24 The Applicant recognises that a number of Interested Parties question whether the opportunities identified would address the residual landscape and visual effects of the Project. The purpose of any compensatory measures is not to remove or reduce those assessed effects. As recognised by NPS EN-1 (2026), compensation does not reduce an adverse effect resulting from a development. Rather, (and without prejudice to the Applicant's position on the policy position in relation to the need for landscape compensation) compensation provides offsetting or enhancement measures that may be considered appropriate where residual effects remain

A.3 **Comments on Interested Parties’ Responses to 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**

Table A.1 Comments on Interested Parties’ Responses to 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]

Party	Interested Parties’ Response to Hearing Action Points at ISH4
Pylons East Anglia [REP6-229]	The base layer map is so faint that it is very hard to distinguish the features, which makes these maps hard to analyse. As noted by the Applicant, they have not talked to landowners, Parish Councils or local people. Lack of discussions with landowners in particular makes these presented opportunities undeliverable. In addition, many of the opportunities are undeliverable from a practical perspective, or meaningless, and obvious opportunities have been missed out. For example, looking at the two Colne Valley maps alone, just some of the issues identified are as follow: • NG proposes new scrub, woodland and grassland in the Woodland Trust area already managed for exactly that. • Likewise, the Applicant proposes 'connective green infrastructure' on the Fordham Estate, which is already managed for meadowland and woodland by the Woodland Trust and is public access. • The Colne Valley maps contain random arrows that point meaninglessly at areas and associate them with the Local Nature Recovery Strategy. • Meanwhile, the map does not show that the Roman River Corridor is in Colchester's Draft Local Plan as both an Essex LNRS nature opportunity and as green/blue infrastructure. • The map shows recommended tree planting in an area that has planning permission for 150+ houses. • The map shows a stretch of Rectory Road, Aldham which could see 'connective green infrastructure enhancements' but it is a quiet country lane with hedgerows already. • Likewise, it appears to show that New Road offers the same opportunity, but it is a road with trees and hedges all along it. An examination by Friends of Wortham Ling of National Grid’s proposal to plant trees and hedges on Wortham Ling finds that: • There has been no consultation locally about this draft plan as far as they are aware. • They are baffled by NG’s proposal to plant trees and hedges on the Ling and do not believe this “opportunity” can be achieved. • Wortham Ling is a SSSI and its citation is based on its landscape as lowland dry heath and acid heathland which would preclude planting trees. In fact previous management schemes have focussed on removing trees. Natural England would have to approve tree planting but is unlikely to do that given the SSSI citation is for acid heathland. The panel has also received representations from Roydon and Bressingham PC about this area. Likewise, for the Walthams, in Essex, a resident tells us that ‘the Draft Opportunities Plan has nothing constructive to add to the debate. What the suggested enhancements will be and how they compensate for the considerable detriment caused by the Project is a mystery. The watercourses are and have for many years been used for the planting and harvesting of bat willows by a long established local industry and it’s unclear how their interests would be protected by “connective blue infrastructure enhancements”’. Near Langleys, lanes already have hedgerows, so could not be enhanced as a nature corridor opportunity, and other areas ear-marked for nature opportunities are already in use for cricket willows.
Aldham Parish Council [REP6-175]	ISH 2 Action 27, ExQ LV 1.28 and Masterplans. Colne Valley Masterplans to be provided at the next deadline, with an agreed position in terms of compensation measures for residual effects on the specified landscapes by deadline 5 (Wednesday 10 June) 8.4.12.2 Response to ISH2 Action Pt 27 “Masterplans” App E Fordham, Fordstreet & Aldham The Applicant has not provided Masterplans, but limited sketch maps; and certainly no “agreed position in terms of compensation measures”. It is clear from the Opportunity (see below) and Constraint Maps provided at Appendix E in answer to Action 27 (see above) that the suggestions are inadequate or incorrect. There is a mismatch between what the ExA requested and what the Applicant provided. It is also clear, as you will see from the notes below, that neither Parish Councils nor local landowners have been consulted. These maps are vague and appear to be very superficial desktop surveys. This can be assumed to be the case across the entire route. There are only two veteran trees shown on the South Constraint Map, but they appear to be in the wrong place. There are two at the bend in Tey Road. [See list below from Woodland Trust map of relevant existing trees]. The habitat connectivity mentioned below has been a long-standing policy of the Woodland Trust with regard to corridors between Chalkney Wood (Earls Colne), Hoe Wood Aldham, Fiddlers Wood and Fordham Hall Estate. • The Applicant suggests part of Rectory Road, Aldham could see 'connective green infrastructure enhancements' but it is already a quiet country lane with mature hedgerows.

Party	Interested Parties’ Response to Hearing Action Points at ISH4
	• Ditto they show that New Road, Aldham offers the same opportunity, but this road also already has mature trees and hedges all along it. • The Local Nature Recovery Strategy also covers the Colne Valley maps, while the Applicant employs meaningless arrows. • The map fails to show the Roman River Corridor, which is shown in Colchester's Draft Local Plan as both an Essex LNRS nature opportunity and as green/blue infrastructure. • The Woodland Trust already manages the area for scrub and woodland • Likewise, the Applicant proposes 'connective green infrastructure' on the Fordham Estate. The Woodland Trust already manages for habitat connectivity, meadowland, woodland, heritage, public access and recreation. • They recommend tree planting where planning permission for 150 houses is granted. Using the Woodland Trust Inventory of Ancient Trees: https://ati.woodlandtrust.org.uk/tree-search/?v=3064934&ml=map&z=13&nwLat=51.91602935663019&nwLng=0.7325649261493083&seLat=51.88907393627662&seLng=0.8561611175557573 the maps for Fordham and Aldham show at least 5 veteran trees and a couple of notables that will soon become veterans are missing: Aldham Map • The Cricketers Willow - ID: 217221 - Location: Fordham Heath TL9447226253 • Pedunculate Oak - ID: 190680 - Location: Tey Road TL9076725992 • Pedunculate Oak - ID: 190679 - Location: Tey Road TL9086326036 • Pedunculate Oak (Notable tree) - ID: 192555 - Location: Roman River Valley TL9038224806 • White Willow (Notable tree) - ID 260066 - Location: Roman River Valley TL9179624410 Fordham Map • Fordham Hall Willow - ID: 215810 - Location: NW of TB45 TL9330928339 • Poole's Farm Oak - ID: 214786 - Location: Essex Way TL9404927500 NB: It appears the area around the B 1508 to the East of Wormingford Airfield has not been surveyed for veteran trees?
Anna Magee [REP6-178]	Response to National Grid's latest 'Action Point 27 - Waveney Valley, Draft Constraints Plan’ I would like to lodge my response to the applicant NG’s suggestions regarding proposals to mitigate environmental and social impact upon the Waveney Valley section of the N2T plan. 1. On page 10 of document EN020027-003572-8.4.12.2 Response to ISH2 Actions. Point 6. NG admit that ‘Project would be visible in close views from the Angles Way within the Waveney Valley’. Heron Meadow is in exactly this location and is within 200m of RG085. The close proximity of the High Voltage powerlines will be incompatible with Heron Meadow continuing to be able to offer a place of sanctuary and healing for those suffering with trauma and difficulties associated with neurodivergence. I would therefore be forced to close this project. There are many studies which demonstrate the adverse effects of EMF waves on humans, particularly neurologically sensitive individuals. 2. NG make claims to the 50m high pylons becoming ‘filtered by vegetation’ through the Waveney Valley. This notion is without conceivable possibility since the tallest established trees in this area are approx. 30 metres high. The Pylons will therefore dwarf all ‘vegetation’; furthermore, any new trees planted by NG will take approximately 80 years to reach their full height – around the time that these pylons will need to be decommissioned. 3. As the landscape in this area has only very gently sloping aspects the pylons will not be visually screened by steep hillsides as is the case in some areas of the West County, they will dominate the horizon in all directions. On page 11 NG describe ‘connective green enhancements’ and ‘connective blue enhancements’. I protest these terminologies as disingenuous and misleading. There is nothing about the N2T project which will enhance the existing beauty, biodiversity and rural tranquillity of the Waveney Valley. Please consider alternatives such as the subsea or DC underground options.
Ardleigh Parish Council and Little Bromley Parish Council [REP6-133]	Ardleigh Parish Council and Little Bromley Parish Council maintain that National Grid's response to Action Point 27 is fundamentally unhelpful because it fails to provide the coordinated masterplan requested by the Examining Authority. The point is not simply that the document is poor or incomplete. It is that the Applicant has failed to comply with the substance of the Examining Authority's request. Action Point 27 required masterplans to be provided, with an agreed position in terms of compensation measures for residual effects on the specified landscapes. The Applicant has instead produced a document whose principal purpose is to explain why such compensation may not be required. The purpose of Action Point 27 was to understand how the substantial residual impacts of the Norwich to Tilbury Project could be addressed through coordinated landscape and environmental enhancement. That request mattered because this is an area facing permanent landscape change over the long operational life of the Project, together with the cumulative effects of multiple nationally significant infrastructure projects. A coordinated long-term strategy was therefore necessary in order to understand whether meaningful

Party	Interested Parties' Response to Hearing Action Points at ISH4
	environmental enhancement could offset the permanent change to the landscape. Instead, the Applicant has produced a document which repeatedly argues that such compensation may not be necessary. Throughout the submission, National Grid emphasises that the Opportunities Plans are illustrative only, are not mitigation, do not demonstrate that compensation is required, are not agreed with stakeholders and may never be delivered. That has an obvious planning consequence. None of the measures identified in the document are secured, deliverable or capable of implementation in their present form, and they therefore provide no mitigation or compensation capable of attracting any meaningful weight in the planning balance. Consequently, the document fails to answer the question posed by the Examining Authority. <i>Draft Constraints Plan</i> Key points for the Examining Authority • First, the Applicant has not complied with the substance of Action Point 27. The Examining Authority requested coordinated masterplans and an agreed position on compensation measures for residual effects. The Applicant has instead produced draft constraints and opportunities plans, expressly caveated as illustrative and not agreed. • Secondly, the measures identified in the Opportunities Plan are not mitigation or compensation capable of attracting weight in the planning balance. They are not secured by the draft DCO, are not supported by landowner agreements, are not funded, are not programmed and are not capable of assured delivery. • Thirdly, the Applicant's own case is that the opportunities identified would not materially change the Environmental Statement assessment of landscape and visual effects. The document therefore does not demonstrate that the significant residual effects identified during the Examination would be avoided, reduced or compensated for. • Fourthly, the absence of an agreed position is material. Action Point 27 expressly contemplated agreement on compensation measures. The Applicant's response confirms that no final agreed position has been reached and that further work would be required if any measures were considered necessary. • Fifthly, the cumulative effects point remains unanswered. The East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. The Opportunities Plan does not provide a strategic or cumulative landscape response to those combined effects. • Sixthly, the proposed measures are disproportionate to the magnitude and permanence of the harm. Broad indicative arrows for planting and green infrastructure cannot sensibly be treated as a response to the permanent industrialisation of the rural landscape caused by major electricity transmission and substation infrastructure. • Finally, the Examining Authority should treat Document 8.4.12.2 as providing, at most, background information. It should not be treated as a coordinated masterplan, as secured mitigation, or as evidence that meaningful landscape compensation exists. The Parish Council disagrees with the assumption that NG uses as starting point: "Views to the Project from within much of Ardleigh (including conservation area) largely filtered and screened by existing buildings and vegetation" <i>Draft Opportunities Plan</i> The Ardleigh and Little Bromley Opportunities Plan is particularly disappointing. It consists largely of broad arrows indicating possible tree planting, hedgerows and green infrastructure, but contains no meaningful explanation of what will actually be delivered, who will deliver it, when it will be delivered, how it will be funded or whether it is even achievable. The Plan bears the hallmarks of a high-level desktop exercise. Several of the proposed enhancement areas are factually inaccurate or incompatible with existing land uses, suggesting that insufficient site-specific assessment has been undertaken. For example: • One of the arrows claiming to be 'opportunities for connective green infrastructure enhancements' goes from a small patch of trees into a commercial greenhouse site. • Indicates tree and hedgerow planting on land adjacent to scheduled monument site, which is an area APC has previously highlighted to be of high archaeological potential. • Only highlights one existing water body – Ardleigh Reservoir. It doesn't for example highlight the reservoir on Little Bromley Road, the Fishing Lake and the new Crown Quarry reservoir (the map should extend further to include this area). These are important parts of the blue-green infrastructure. • Glebe Corner is shown as 2 areas. Area 1 is partly owned by Essex CC but the area shown extends into a privately owned cultivated field. Area 2 is not Glebe Corner but an entirely privately owned cultivated field on the other side of the road. The difficulty is therefore threefold. First, there is no strategy: no vision for the affected landscape, no stated objectives, no priorities and no explanation of how the proposed measures would work together as a coherent masterplan. Secondly, there is no delivery mechanism: no funding, no landowner agreement, no implementation programme, no governance arrangement and no means by which the measures would be secured through the DCO. Thirdly, the factual inaccuracies identified below undermine confidence that the plans have been prepared following any sufficiently detailed assessment of the local area. The Applicant itself acknowledges that much of the proposed enhancement lies on land outside its control and that no agreements have been reached with landowners. That is not a minor qualification. It means that the proposals are not secured, are not presently deliverable and cannot be treated as measures which would address the identified residual effects. Despite Action Point 27 expressly contemplating an agreed position on compensation measures, the Applicant has not produced an agreed position, nor has it undertaken the collaborative exercise necessary to convert broad illustrative ideas into a deliverable masterplan. The proposals also bear no relationship to the scale of harm arising from the development. Ardleigh and Little Bromley face the permanent construction of the East Anglia Connection Node, associated 400kV overhead lines, cable infrastructure and the cumulative effects of the adjacent North Falls and Five Estuaries substations and the proposed Tarchon interconnector. Against infrastructure of this scale, the proposed response amounts to nothing more than indicative landscape planting. The proposed measures are

Party	Interested Parties' Response to Hearing Action Points at ISH4
	wholly disproportionate to the magnitude and permanence of the adverse effects identified during the Examination. The document provides no evidence that such limited measures could in any meaningful way compensate for the permanent industrialisation of the local landscape. <i>Both Plans</i> The map used although made so opaque that it is virtually unreadable is also out of date. For example it doesn't show current route of footpath 27. It doesn't give any confidence that this exercise has been taken seriously. <i>Cumulative Effects</i> The document also fails to address cumulative impacts. Ardleigh Parish Council and Little Bromley Parish Council have consistently explained that the East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. While the Constraints Plan identifies neighbouring nationally significant infrastructure projects, the Opportunities Plan does not provide an integrated strategy for addressing their combined effects. It simply reproduces the same project-by-project approach which has characterised the Applicant's cumulative effects assessment throughout the Examination. A genuine masterplan should have considered the landscape as a whole rather than treating individual projects in isolation. <i>Conclusion</i> Perhaps most significantly, the document misunderstands the purpose of the Examining Authority's request. The Inspector did not ask whether compensation was justified; that is ultimately a matter for the Examination and the Secretary of State. The Inspector asked the Applicant to prepare coordinated masterplans and seek an agreed position on compensation measures. Instead of undertaking that exercise, much of the document is devoted to explaining why compensation should not be required. The result is a submission that provides little practical assistance to the Examining Authority or to Ardleigh and Little Bromley. It contains no long-term vision, no deliverable programme, no secured funding, no implementation strategy and no measurable environmental outcomes. It is therefore not a coordinated masterplan in any meaningful sense. In those circumstances, Document 8.4.12.2 cannot reasonably be treated as the coordinated masterplanning exercise requested by the Examining Authority. It follows that it cannot assist the Secretary of State in determining whether meaningful landscape compensation exists, or whether the identified residual and cumulative effects can be adequately addressed. For these reasons, Ardleigh Parish Council and Little Bromley Parish Council maintain that Document 8.4.12.2 does not satisfy the intent of Action Point 27 and should not be afforded any weight. The Applicant has not demonstrated how the significant residual and cumulative impacts on Ardleigh and Little Bromley would be effectively addressed, nor has it provided the coordinated, deliverable master planning requested by the Examining Authority.
Babergh District Council and Mid Suffolk District Council [REP6-135]	Comments on REP5-199 Response to ISH2 Action Point 27 – Masterplans: The Councils wish to reiterate their position that appropriate and meaningful mitigation / compensation in the area of Bramford substation would not be limited to landscape and ecological enhancements but would address issues previously raised including asset security and resilience and public safety in the event of an incident, vehicular access, recreational access and heritage. 2.5.4. Whilst acknowledging the Applicant's position that mitigation / compensation of all harm is not required and reference to the BTNO decision The Councils consider it material to have regard to the significant growth in developments connecting to Bramford substation, enabled by the Bramford to Twinstead NSIP development and the reasonable expectation of further similar development enabled by the proposal. The Councils are concerned that the cumulative effects arising from the volume and concentration of development around the substation comparative to the scale of communities and capacity of the landscape, together with the fact of no prior meaningful mitigation / compensation in this area necessitates the compensation requested by the LPAs in this instance and meets the CIL 123 tests. The Councils note the comment at 2.7.2 that the applicant's expectation is for closing submissions / matters not agreed on this topic, however The Councils remain committed to constructive dialogue with the objective of reaching mutual agreement. Further to verbal commitments made at ISH4 The Councils have met with Burstall Parish Council and have reached out to other affected Parish Councils / Meetings with a view to better understand local concerns and inform ongoing negotiations with the applicant. Should a position not be settled by the close of the examination and the ExA feel a scheme of site-specific compensation is necessary, The Councils respectfully request the ExA to direct that such a scheme of additional mitigation / enhancement should be agreed with local planning authorities in consultation with affected Parish Councils.
Bressingham and Fersfield Parish Council [REP6-141]	We represent the residents and businesses located in the parish of Bressingham & Fersfield which lies in the Waveney Valley immediately to the west of Roydon. As a registered 'Interested Party' we wish to comment upon the Appendix 'A', Action Point 27, Waveney Valley (including Snow Street, Roydon Fen and Wortham Ling) – Draft Constraints Plan. We wish to challenge the statements made by the applicant in the Draft Constraints Plan concerning visual impacts and other harms resulting from the installation of pylons and associated overhead cables across the Waveney Valley and adjacent land. We believe most of the 11 statements listed on the map on page 10 of the Plan to be flawed and potentially misleading in some way and this challenge is made in the interests of clarity and the pursuance of factuality. Our area of primary concern is of course along the eastern parish boundary, where pylons RG76 to RG86 will be prominently visible in increasing degrees of visual nuisance. Pylon RG81 will be some 300 metres from the nearest property in Common Road, whilst RG82 will stand a mere 170 metres from the nearest property in Bressingham Road. Contrary to the claims made by National Grid (NG), the impact of these 50 metre-tall structures will not in all cases be "filtered by vegetation". In any event, given that almost all local vegetation is deciduous, any so-called 'filtering' will be largely absent during the winter months. Continuing southwards over and beyond the A1066 Thetford to Diss road, the pylons and transmission cables will maintain a highly prominent aspect until they turn eastwards and away from Bressingham. The project construction phase will cause significant disruption to the several businesses along our section of this highway, the negative financial impact of which should not be underestimated. Once the line becomes operational, the negative impact on our famous Steam

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	Museum & Gardens will doubtless continue. It is important to note that at the last survey, this popular South Norfolk visitor attraction was deemed to have generated £1.7 million per year towards the local economy. In item 3. of the NG statements, it states, “Views east from Bressingham Steam and Gardens filtered by vegetation”. Item 5. states, “Layers of vegetation filter views, including woodland within the valley”. As a Parish Council, we are reliably informed that these claims are either simply inaccurate or deliberately misleading. Yes, there is a modest element of seasonally varied ‘vegetation filtration’, but this is not high enough in most locations to fully obscure the proposed pylons from a ground-level viewpoint. Visitors to this significant heritage centre have a reasonable expectation of enjoying steam train rides around an historically pastoral vista. Pylons will be decidedly detrimental to this experience. It is noteworthy that there is no mention in item 4. of the ‘Constraints Plan’ of the impact the pylons will have (particularly RG85) on the ‘Heron Meadow Centre’. This essentially relies upon its natural setting in the valley to provide its healing and learning services, thus is highly likely to face closure should either pylons or even a short section of underground cabling be installed. At this point we must raise the issue of NG’s briefly promoted yet hurriedly disregarded “Waveney Valley Alternative”. This short-lived proposal for a short section of underground AC cabling across the River Waveney and its immediate surroundings was proposed to alleviate the long-term visual harm that will be caused by pylons. For reasons not fully explained but allegedly centred on unsuitable soil conditions in the valley, NG withdrew this proposal without any meaningful consultation. It appears that no significant alternative or practical mitigation has been properly considered by NG, despite ‘paper exercises’ such as this. Merely paying ‘lip service’ to the consultation process serves only to ‘add insult to injury’! -2- Whilst NG may reasonably argue that the originally planned pylon alignment was moved eastwards and a little away from being directly over the Steam Museum as a result of the first consultation in 2022, this did of course only serve to move the misery closer to our neighbours in Roydon. The visual impact on the Grade I Listed church is in direct contravention of the Holford Rules, as are the numerous direction changes. Scant regard has been shown to the wildlife corridor that joins the Ramsar site of Redgrave Fen, Bressingham Fen, the SSSI of Wortham Ling and the LNR of Roydon Fen. Nor does any consideration appear to have been given to the WaLOR project (item 9.) planned for this section of the Waveney Valley and intended to reinstate the natural fenland as an aid towards future flood prevention downstream. We question how concrete pylon bases or other subterranean infrastructure can possibly be compatible with this? No overhead or even underground transmission line of any kind should be countenanced in this vulnerable and ecologically sensitive landscape. A joint survey commissioned in 2024 by Norfolk and Suffolk County Councils designated this area as a “Valued Landscape” – not a description respected by NG it sadly seems. Despite also contravening elements of “The Gunning Principles” and the “Treasury Greenbook” by failing to properly consider alternatives, NG are displaying an arrogant disregard for our rural communities. It appears that none of the aforementioned designations and ‘Rules’ afford us any protection whatsoever from this invasion of steel monstrosities and we can only therefore ask the Planning Inspectorate to maintain a robust oversight on our behalf. We are minded to limit comment on the ‘Draft Opportunities Plan’ on page 11 of the Draft Constraints Plan. As with the repeated references to “vegetation filtration” on page 10, this rough and vaguely outlined small scale sketch is of no real value to this argument and could be viewed simply as paying further lip-service to the consultation process. There are few, if any so-called opportunities that present themselves as a direct result of this sweeping industrialisation of our countryside. It is highly doubtful that Natural England will agree to tree planting on the dry heathland that is Wortham Ling as this could conflict with the very basis of its designation as a SSSI. Along with a great many of our residents and those in neighbouring Roydon and Wortham, we contend that this proposed route, be it pylons or underground, is without merit on numerous counts. Partially encircling Roydon on three sides, passing close by homes, businesses, Grade I Listed buildings and visitor attractions, transgressing supposedly protected fenland and river valley and threatening wildlife – this is an egregious proposal which has no place here. An integrated offshore grid has always been the preferred and common sense option long-since put forward by the well-supported campaign group that opposes N2T pylons. Furthermore, a workable and financially viable compromise of underground HVDC has also been proposed, following the existing line of pylons running from Norwich to Bramford on the eastern side of Diss across largely open and more sparsely populated terrain. This would afford far easier access for construction, upset a lot less people and probably cost less. Certainly it would incur less legal fees, probably less community compensation payments and less 10-year discounts off electricity bills for those in close proximity to pylons. Bressingham & Fersfield Parish Council wishes to register its concern over the long term impact of this current plan on our community. The mental health and well-being of our community is under threat, as well as all the visual and environmental harms it will inevitably bring. No significant consideration is being afforded us by NG, who are effectively employing ‘bully-boy’ tactics to achieve what they see as a ‘done deal’ and no amount of spurious “vegetation filtration” or “opportunities for connective green infrastructure enhancements” can possibly hide that. We say a comprehensive “NO” to pylons!
Burstall Parish Council [REP6-143]	Landscape/ Mitigation Opportunities. National Grid Document: 8.4.12.2: Response to Appendix C, Action Point 27 – Burstall and Bramford Constraints and Opportunities Plans. BPC is hugely disappointed with the Burstall and Bramford Constraints and Opportunities masterplan produced by NGET, which is inadequate, poorly thought out and potentially damaging to historic landscape and setting of our village. It fails to understand the nature of the historic rural landscape, the impact to the village and importantly, the damage to the environmental cause by the proposed works and the real opportunities for enhancements and improvements. Importantly, the plan is absent of any opportunities whatsoever between Burstall village and the pylon route/ Bramford substation. Well documented, there is zero mitigation offered to Burstall from the proposed NGET pylon plan. The concentration of pylons from both the Bramford to Twinstead Project and the Norwich to Tilbury project directly impact Burstall village more than any other, yet the mitigation hierarchy here has been ignored, and the only appeasement offered has been an opportunity for landscape and planting mitigation. To now discover a plan which offers nothing to mitigate prominent views and the impact from Burstall and surrounding areas south and west of the substation is both unbelievable and unacceptable. To have the whole of the area south of the substation designated as either ‘rich in biodiversity’ or ‘with the potential to be’, under the Local Nature Recovery Strategy (LNRS), but then to have it ignored by the applicant makes a mockery of this plan. With no consultation of the village, the PC and those with local knowledge, and no coordination with landowners and other interested parties, this plan suggests that the Applicant has failed to do any credible research in relation to mitigation in the village, and have seen the preparation of the masterplan as nothing more than a tick-box exercise.

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	We stress that BPC considers properly thought out biodiversity enhancements, planting and mitigation to be essential in relation to the pylons. We feel it is vital to be involved with the development of the plan which must take our concerns into account – we have a marked up plan and have completed a drone survey of the area which we would be delighted to share: • No mitigation to views from the south of the Bramford Substation which represent the most prominent and impactful locally. Viewpoints not considered and not mitigated: Pigeon Lane; Hintlesham Golf Course; Orchardlands; Burstall Road; Hall Lane. Local knowledge can help provide solutions for planting to mitigate these views. • Opportunities ignored for planting to boost the cover provided along Cooks Lane, currently the only barrier of natural vegetation between Burstall village and the substation, and we believe under threat of removal from this and other projects despite its ancient history and ancient trees. Many opportunities exist here to enhance an already treasured and well known historic route. • Opportunities ignored to enhance the existing ancient woodland remnants with additional planting and wildlife corridors. Bullen Wood; Round Wood; Elms Grove; and, Burstall Long Wood, all under threat, can easily be enhanced by planting wildlife corridors between all, establishing one protected woodland area with a large border/ buffer zone. This would also work to shield views of the pylons from Burstall Village. The footpaths around these woodlands are treasured locally and represent tranquil amenity areas to enjoy the natural environment. • The opportunity has been ignored to enhance the ancient copse to the south of the substation, west of Elms Grove. With various mature and tagged trees, this copse is likely to have been missed from the ancient woodland inventory and should be added to and enhanced. It forms part of the wider woodland area and well used wildlife corridors here should also be protected. • Opportunities ignored for pond restoration and recovery, both in Elms Grove and Burstall Long Wood, visible on old maps and with great potential for biodiversity enhancements. • Old maps highlight the network of hedgerows which would have existed in the fields south of the substation. A couple of these still exist, directly south and west of the substation and with their rich concentration of wildlife must be protected and enhanced before they to are lost. • The proposed enhancements along the Belstead Brook waterway will do nothing to mitigate views given this is a low lying valley. It is also already well planted and managed. • The whole area south of the substation, once a protected Special Landscape Area (SLA), is now covered under the Local Nature Recovery Strategy (LNRS) as either rich in biodiversity or with the potential to be. As such, it should all be included in the ‘opportunities’ plan, whereas it currently is not. • No coordination or discussion with landowners south of the substation and other interested parties to hear their thoughts and plans for opportunities for biodiversity enhancement and planting. BPC are already in discussion about what is possible. Finally, yet again, NGET have failed to mention the proposed Alcemi/ Brunfort BESS, despite being referred to in this examination, and being of huge note to this plan in terms of potential impact and the requirement for extensive mitigation.
Caroline Homewood [REP6-181]	National Grid's response in Appendix E does not satisfy the Examining Authority's request for a coordinated masterplan for the Colne Valley. Rather than presenting a comprehensive strategy for addressing the acknowledged residual landscape effects of the Proposed Development, Appendix E comprises a constraints plan and a series of indicative opportunities which are expressly stated to be illustrative only and not commitments. The Constraints Plan itself identifies a wide range of significant effects arising from the proposal, including new and close-range views of the overhead line from Fordham, Ford Street, Gallows Green and Aldham, effects on the setting of the Grade I listed Church of All Saints, impacts on public rights of way and National Cycle Route 13, and the permanent alteration of the landscape character of the Colne Valley through the introduction of large-scale transmission infrastructure. National Grid also acknowledges that the Project will cross the River Colne valley floor and influence the tranquillity and character of the valley. These are substantial and permanent landscape impacts. Despite recognising these effects, the accompanying Opportunities Plans propose only broad and generic environmental enhancements, principally woodland planting, hedgerow creation, habitat connectivity and public rights of way improvements. Whilst these measures may provide ecological benefits, there is no evidence demonstrating that they would compensate for the principal landscape harm arising from the permanent introduction of a line of steel lattice pylons across a highly sensitive historic river valley. No assessment has been provided to explain how the proposed measures would reduce visual effects, restore landscape character, improve tranquillity or lessen impacts on heritage assets. The response is particularly deficient because there is no strategic landscape vision for the Colne Valley. A genuine masterplan would identify the long-term landscape objectives for the valley, explain how compensation measures would work together to restore landscape quality, identify priorities for implementation, and demonstrate how the overall environmental outcome would address the acknowledged residual harm. Appendix E does none of these things. Instead, it simply illustrates potential locations where enhancements might be possible, without explaining how they relate to the impacts identified on the Constraints Plan. The Opportunities Plans also fail to respond specifically to the most sensitive receptors identified by National Grid itself. There are no bespoke proposals for Fordham, Ford Street, Gallows Green, Aldham, the Grade I Church of All Saints, the Essex Way, National Cycle Route 13 or the River Colne valley itself. Nor are there any heritage-led landscape proposals, such as strengthening the setting of listed buildings, restoring historic field patterns, or reinforcing the distinctive historic landscape character of the valley. Consequently, landscape, heritage and ecology are not integrated into a coordinated strategy as envisaged by the Examining Authority. Equally concerning is the absence of any measurable outcomes or implementation strategy. The document contains no commitments regarding the extent of woodland creation, hedgerow planting, habitat restoration, landscape enhancement or public access improvements. There are no targets, no delivery programme and no funding mechanism. Furthermore, National Grid acknowledges that many of the proposed measures lie outside the Order Limits, that discussions with landowners have not taken place, and that delivery cannot currently

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	be assured. National Grid further weakens the value of Appendix E by repeatedly emphasising that the Opportunities Plans are illustrative only, do not represent agreed compensation, are not mitigation, would not alter the Environmental Statement assessment and should not be interpreted as an acceptance that landscape compensation is necessary. These repeated disclaimers significantly diminish the practical value of the document and demonstrate that National Grid has not approached the exercise as the development of a genuine compensatory landscape strategy. Finally, National Grid frames much of its response as a legal argument regarding whether landscape compensation is required under the National Policy Statements and Regulation 122 of the Community Infrastructure Levy Regulations 2010. Whilst that policy position is noted, it does not answer the Examining Authority's request. The purpose of Action Point 27 was to explore what coordinated environmental enhancements could address the acknowledged residual landscape effects if development consent were granted. Instead of engaging constructively with that request, National Grid has produced a document that largely seeks to reserve its legal position while offering only indicative opportunities that remain untested, unfunded and unsecured. For these reasons, Appendix E cannot reasonably be regarded as the coordinated masterplan requested by the Examining Authority. It identifies the harm but fails to provide a coherent, evidence-based, deliverable or measurable strategy capable of compensating for the permanent landscape and visual effects of the Proposed Development within the Colne Valley. Accordingly, little weight should be afforded to Appendix E as evidence that National Grid has adequately addressed the issue of landscape compensation. Once again, no attempt has been made to consider the cumulative harm the intended pylons will have to the historic and high amenity Colne Valley. Appendix E attempts to justify the location of each pylon, but the justifications are impossible and evident to anyone who visits the area. The only tall buildings in the area are church spires. 50mt pylons are the equivalent of a 15 storey block of flats so to suggest that pylons can be “filtered or screened by intervening buildings” is not true. I specifically refer to National Grid’s numbered points: 2. Pylons are located in open fields with little or no screening. The assertion that 50mt pylons and cables can be largely filtered or screened by 2 storey buildings and 2-3mt hedges is impossible. The sloping landform is gentle, which characterises the Colne Valley’s special landscape. To state this will “largely filter or screen” pylons from Fordham Village and the Grade I listed Church is not possible or true. 3. To suggest that views towards the Project from within the Ford Street conservation area are filtered in places by intervening buildings, landform and vegetation is absurd. National Grid is placing pylons on high points of the valley to exacerbate harm to the Ford Street conservation area. The location of Pylon TB48 is approximately 30mts higher than the Ford Street conservation area, so increasing the pylon height to 80mts. TB49 is in an open field and located on a slope (approximately 15mts) higher than Ford Street behind hedge that is approximately 4mts high. TB51 is also situated 40mts higher than Ford Street. The run of pylons are located in elevated positions that will loom over and encircle the Ford Street conservation area. The claims made by National Grid about the Project being filtered by intervening buildings, landform and vegetation is not possible or true. 4. This is a contradictory statement. The Colne Valley is to be devastated by pylons and cables and National Grid claim it’s direct route minimises effects on mature woodland and riparian vegetation. Not possible and not true. 5. Not true. Most of the land on which the run of pylons from TB45 to TB52 is land that is open to the public and forms part of the Fordham Hall Estate, not just the routes shown. Most of the land is open grazing land with hedges and some trees but no trees anywhere near the height necessary to offer genuine filtering from pylons and cables. TB48 is right by the roadside some 35mts above the Ford Street conservation area and next to the Roman archaeological villa. TB51 and TB52 are at the top of valley located either side of the A1124 the main road into the Ford Street conservation area. At present, the drive into the Ford Street conservation is beautiful, from the high point of the valley (shown numbered 6 on the map) you have open views of the Colne Valley and then drop 40mts into the Ford Street conservation area. The map clearly shows the high concentration of listed buildings in the village. Pylons TB51 and TB52 and the associated cables will become the gateway into the Ford Street conservation area 8. National Grid acknowledge the high public amenity value of the Colne Valley but offer no mitigation. 9. National Grid is locating pylons on raised valley sides and is not opting for a route where better use of the valley floor could be utilised. 11. Not true. No trees in the Woodland Trust managed estate will obscure the pylons. It is derisory to put this forward as a solution. Even if a small part of the bottom of the pylon is obscured all the cables running between the pylons will to be visible. No buildings, landform or vegetation will obscure the cables which will strewn diagonally across the Colne Valley from Fordham, via the Ford Street conservation area and onto Aldham. 12. Again, there may be minor shielding of a small part of the foot of the pylon, but the pylon and cables will be clearly visible for miles around. 13. Not true. As outlined above, the Ford Street conservation area is going to be particularly harmed by National Grid placing pylons in elevated positions. 15. This is an elevated positions, some 40mts above the Ford Street conservation area (total height of 90mts). No vegetation or landform will mitigate the harm of the pylon and cables at this location. 16. Not possible and not true. No views are going to be filtered from the pylons and cables here. 17. The mature trees and woodland blocks referred to are not even half the height of the pylons. Not possible and not true
Charles Micklem [REP6-183]	National Grid Masterplans (Document REP5-199) National Grid has produced the Masterplans without any meaningful engagement with the affected landowners. In my view, this has resulted in a number of fundamental inaccuracies and impractical proposals. I comment below on Appendix F. Hedgerow Planting The Masterplan identifies opportunities for approximately 600 metres of new hedgerow planting along Chatham Hall Lane, or approximately 1,200 metres if both sides of the road are included. This does not reflect the existing situation. In reality, only around 50 metres on one side of Chatham Hall Lane currently lacks an established hedgerow, representing approximately 4% of the length identified by National Grid. The Masterplan therefore significantly overstates the opportunities for new planting and presents a misleading impression of the landscape. Some replacement hedgerow planting will inevitably be required following construction. However, this will largely be necessary because National Grid proposes to remove existing hedgerows to facilitate its own works. Reinstating vegetation that has been removed for construction purposes should not, in my view, be presented as an environmental enhancement. The Masterplan also proposes a new hedgerow running across one of my agricultural fields. I cannot understand the justification for this proposal. National Grid already proposes to divide the field with overhead line infrastructure. Introducing an additional hedgerow across the field would create further fragmentation, reduce operational efficiency and make agricultural management significantly more difficult. It is neither a practical nor an acceptable proposal.

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	Watercourse Enhancements The Masterplan identifies areas for watercourse enhancement but provides no explanation of what these works would involve. The area identified includes one of the Estate's principal cricket bat willow plantations, which is currently one of our most valuable and productive crops. If the proposed enhancements would restrict or prevent the continued cultivation of cricket bat willow, they would result in a significant financial loss to the business. Without detailed information regarding the nature of the proposed works and their long-term implications, it is impossible to assess their impact or support the proposal. Need for Meaningful Landowner Engagement These proposals demonstrate why meaningful engagement with landowners is essential before landscape enhancement plans are developed. The Estate has been managed by my family for generations, and we have a detailed understanding of how the land functions in practice. While discussions with the local planning authority are clearly important, they cannot replace consultation with those who actively manage the land on a daily basis. If National Grid genuinely wishes to deliver lasting environmental enhancements through appropriate tree planting, hedgerow creation or habitat improvements, I would welcome the opportunity to work collaboratively to identify measures that benefit both the project and the Estate. However, that process should begin with meaningful consultation. Developing proposals without first understanding how the land is managed risks producing plans that are impractical, unworkable and ultimately unacceptable to the landowner.
Christopher John Vermont [REP6-187]	National Grid has issued a paper titled "Document: 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans" - Planning Inspectorate Reference: EN020027. Appendix D purports to show opportunities near the EACN at Ardleigh to introduce tree planting and other mitigants. I own Hungerdowns, a grade 2 listed farmhouse set in a plot of approx. 10 acres just to the North of the EACN. While App D correctly records that roughly 7 of the 10 acres is existing woodland (which we planted 30 years ago) it should be noted that the trees are all deciduous and will provide little protection against noise pollution during the winter. We are also puzzled by the suggested "opportunities for connective green infrastructure enhancements" from the edge of our wood heading N.E. up Hungerdown Lane. The section of Hungerdown Lane highlighted consists of 30-40 individual properties. The properties mostly already have mature hedges facing the lane and it is difficult to see what additional opportunities exist. If NG plans to place "connective green infrastructure" further away from the lane this seem ambitious, if not impracticable. It would require negotiating with 30 - 40 landowners to give up part of their back gardens so that the "connective green infrastructure" could be created. Furthermore, some of the owners run businesses from the properties such as organic vegetable supplies and equestrian centres. It doesn't seem that NG has made a serious attempt to respond to the Inspectorate's request and I don't believe NG or their land agent has spoken to anyone locally to explore whether such opportunities actually exist
Christine Murton [REP6-186]	I am writing in response to National Grid Document 8.4.12.2, focusing on Appendix A for the Waveney Valley area. Having attended the Roydon Parish Council meeting and spoken with several neighbours, I wish to express my full support for the council’s position and the views shared by residents. Roydon has already been severely affected on three sides by the Norwich to Tilbury route. In the Waveney Valley, the pylons have been re-diverted through one of the most distinctive and beautiful landscapes west of Diss. There is no meaningful mitigation that National Grid (NG) can offer for such harm other than placing the infrastructure underground or taking the route offshore. The village was briefly presented with an undergrounding option, the so-called Waveney Valley Alternative, but it quickly became apparent that NG’s engagement was aimed more at appearing responsive than at genuinely investigating this solution. By offering an underground route at all, NG implicitly acknowledges the importance and sensitivity of this landscape. On the draft opportunities plan—which is surprisingly amateur in style—NG suggests mitigating harm through “green enhancements.” It is nonsensical to describe opportunities for additional tree or hedge planting in areas already rich in mature vegetation, such as Roydon Fen and Wortham Ling. Walking along the northern footpath through Wortham Ling, walkers will be confronted with an uninterrupted line of pylons for approximately 500 metres, stretching directly towards Roydon Church and running adjacent to the Angles Way, a designated long-distance footpath. This view cannot be “filtered” unless NG intends to blanket the entire private meadowland in new woodland. This meadowland is also the proposed location for the WaLOR project, which NG appears keen to attach itself to by offering support. However, while the WaLOR project is valuable, it involves the creation of water meadows and will not provide any meaningful screening of the pylons. The proposed pylon route passes close to the important Grade I listed round-tower church in Roydon, and regardless of NG’s assertions, the pylons will dwarf it within its historical setting. The route is then forced between Roydon Fen—a rare fenland nature reserve—and Wortham Ling SSSI, both of which support numerous red-listed species. Furthermore, the renowned Angles Way follows the line of pylons west from the Fen, meaning the visual impact will be unavoidable for walkers and visitors. We were never given any clear and plausible explanation as to why the Waveney Valley Alternative was ultimately dismissed, ‘unsuitable soil conditions’ do not really cut it when you compare it with other feats of modern civil engineering, this then was a flimsy fob off. In fact, there has only ever been a dismissive approach by NG to exploring other alternatives such as the more viable, cheaper and less intrusive method of cable ploughing which was never explored at all. I have left it to others to describe more fully how the Holford rules are obviously not adhered to in this beautiful landscape, and I support their views entirely. We own the land just north of Snow Street, where a popular public right of way leads directly through the field to pylon RG80. From this point, the footpath splits east and west, with pylons visible in both directions as far as the eye can see. On the draft opportunities plan, NG suggests mitigating this harm through “green enhancements.” However, at no stage in the planning process have they discussed these proposals with us. Moreover, the location they highlight contains our own substantial mature hedgerow surrounding the field—part of which NG intends to remove (despite the presence of an adequate gate) to install scaffolding. This hedge is nowhere near tall enough to mitigate views of the pylons for residents along the northern edge of Snow Street. What’s more, any additional planting proposed by NG would be refused by us, as it would be placed within our crop-growing field, which forms part of our livelihood.

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	The other marked “enhancement” on the map is very unclear, I would go as far as to say it’s just a squiggle, blindly drawn, but appears to indicate existing trees and hedges and an existing woodland known as Little Green or it might indicate the County Wildlife Site of Brewers Green, I’m not sure. Both are close to each other and both have extensive existing woodland. There is no room for NG to claim that they can mitigate successfully in this area without planting woodland all over our field. As I have already stated, this is the first time I have seen or heard about any such attempt at compensating in this way for the loss of our beautiful views. In summary then, there is a reason why NG offered the Waveney Valley Alternative and it’s because they recognise that this really is a landscape of outstanding beauty. For that reason, it is also why NG have been unable to abide by the Holford rules here unless they go underground or offshore. It is astonishing that only now—at this very late stage—those living closest to the proposed pylons are seeing any form of a draft opportunities plan, even if the map provided is both inaccurate and poorly produced. In their response NG appears to be relying on existing woodland, established hedgerows, and even the WaLOR project to give the impression of meaningful mitigation. In reality though they offer nothing new. This response is a lazy fob off, a tick box exercise which simply repackages what already exists while failing to address the fundamental and unavoidable visual harm the pylons will cause. NG are unable to minimise harm in the Waveney Valley unless they go underground, because this small, treasured area holds too many obstacles for them to avoid or mitigate against. Obstacles in the form of our grade one listed round tower church, our important and rare nature reserve, our very much loved and used SSSI, our designated County Wildlife Site, a multitude of red listed bird species, a famous and popular footpath in the form of the Angles way as well as a huge network of other footpaths, all of which lays within a unique and designated ‘Special Landscape’ of water meadows. It is all this that NG will be harming by installing and squeezing 50 metre pylons directly through it.
Claire Matthews [REP6-188]	I am responding to the National Grid (NG) document 8.4.12.2, focusing on Appendix A, Action Point 27, the Waveney Valley Area, where I have been a resident and business owner for the last 5 years. The Waveney Valley is an area of outstanding beauty and the specific area in the document contains nature reserves and Worham Ling, an SSSI, which support many red-listed species. The Angles Way historical footpath passes through this area, which also contains a multitude of listed buildings including the Grade 1 round-tower church of St Remigius. The area and its views, wildlife and footpaths are cherished by residents and visitors alike. The proposed construction and erection of the 19, 50 metre pylons, squeezing through this area would cause great harm to its landscape, wildlife and residents, and the proposals drafted by NG in Action Point 27 are poorly considered and would be woefully inadequate. There are several references to existing vegetation and building ‘filtering’ the views of pylons from some aspects, when it is obvious that no vegetation or buildings in our area would provide any but the barest screening of these monstrous pylons. The Draft Opportunities Plan refers to a few enhancements and plantings but these would be inadequate and appear to have been proposed without research into their true feasibility. The only solution that could mitigate the devastation to our area that would be caused by the Norwich-Tilbury project would be to reinstate the Waveney Valley Alternative, undergrounding the cables. That this had been presented by NG indicates that they are aware of the sensitivity and importance of our treasured landscape. At the NG roadshow that I attended, residents positively discussed with NG staff that there was a possibility of extending the Waveney Valley Alternative to the north, beyond Roydon. This would mitigate the visual pollution caused by the proposed pylons wrapping around our village and protect the Cherished Views from Darrow Lane (key views 27 and 28). These are referred to in the Diss and District Neighbourhood Plan’s Key Views, adopted 16 October 2023. Document 8.4.12.2 is yet another example of the inadequate communications and responses that residents have received from NG. This document records that it was designed, drawn, checked and approved - all on the 26th of June and it would indeed seem that this has been produced in haste and with the lack of consideration and care for both people and the environment that continues to characterise NG’s Norwich-Tilbury project
Colchester City Council [REP6-145]	Regarding Appendix E of NGETs response to AP27, CCC have had no discussions about this masterplan nor are we clear if the ‘proposed/potential’ works are in land NGET own or control or will do in the future. This was noted by an IP at ISH4. It was clear for at least some of the sections of the route where masterplans have been provided, landowners are not in agreement with the suggested planting and therefore CCC question the deliverability of these proposals. Specifically in the Colne Valley (snip below) [see REP6-145] it is noted that planting a hedge alongside the road does not mitigate the impact of the pylons, it simply reduces the visibility of the valley itself. CCC submit that this is not characteristic of the Colne Valley. The open views however are characteristic of the valley and are part of the reason the area is so special in landscape terms. The suggested enhancements will not adequately mitigate the degree of harm that the pylon alignment will cause which is a matter of landscape scale harm due to the nature of the proposed OHL and towers. Regarding the 5 year tree monitoring period, CCC have previously set out how this is clearly insufficient and require a 10 year period to ensure the planting takes and to ensure that trees that die in the later years are replaced. The ExA raised the failure of the planting on the A14 in the Cambridge area, noting the similarities in location and climate. This is a very useful example of why long term monitoring is considered essential.
David Andrew Chapman [REP6-193]	I comment on Appendix F to National Grid’s document 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans. Item 3 of the Constraints Plan claims views from the conservation area within Great Waltham “would be largely filtered and screened by existing buildings and vegetation” which ignores the fact that the numerous listed and heritage buildings at Minnow End are within the conservation area and will suffer overbearing views of the pylon line from proximity to the Project. Item 9 of the Constraints Plan states that the Chelmer Vallet is “shallow” at this location. The land rises 20m from the river to the location of pylon TB143 adjacent to Balls Farn which will be 70m or more above the river bank and a dominating presence seen from afar - a circumstance repeated north of the river with pylon TB136. National Grid seeks to justify the Project here by reference to steer lighting and traffic signage on the B1008 (Little Waltham by-pass) a single carriageway rural road. The street lighting is part-time only (save at the junction) and together with the signage extent is a redundant legacy of the 1970s construction of the highway as an A Road since downgraded and should itself be removed (the new A road, Essex Regiment Way, now by-passes Little Waltham to the east and was constructed without such lighting, (save at roundabouts). Contrary to National Grid’s claim, the route at this location is not compliant with Holford Rule 2. The proposed slight deviation to mitigate the effect on Langleys, unforgivably brings the Project within the estimated extent of the Pre-Belgic Iron Age Settlement in respect of which the Scheduled Monument is a nearby marker. This again proves the unsuitability of this location packed with heritage assets

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	of national importance for the Project. Finally there is reference to an opportunity for “connective blue infrastructure enhancements” - I have no idea what this jargon is meant to signify but the watercourses identified are subject to cultivation and harvesting of bat willows for the local rural cricket bat making industry which must be respected.
David Powley [REP6-194]	I am writing as a resident of Roydon. I manned the stalls we ran at Roydon Village Hall and on Darrow Lane for our own community survey on the Waveney Valley Alternative — full day shifts, talking to whoever came through. Nearly the whole village told us they use and value Darrow Lane, Roydon Fen and Wortham Ling, and the overwhelming majority wanted this section undergrounded. National Grid's Appendix A doesn't reflect any of that. What's actually at stake This route changes direction as it crosses the village. [RESIDENT'S OWN KNOWLEDGE, NOT FROM A NATIONAL GRID DOCUMENT: it turns at RG81, RG82 and RG83 run behind Roydon parallel with Darrow Lane, RG84 sits at the edge of the village on the A1066, then it turns again to cut across the valley to RG92, with RG88 towering directly between Roydon Fen and Wortham Ling.] That's at least three direction changes through one small village, on ground National Grid's own plan admits has almost no cover. Along that route sits St Remigius Church (Grade I listed), a cluster of Grade II buildings on Snow Street, and The Gables on Darrow Lane, a 17th-century timberframed house. South of the village, Roydon Fen LNR and Wortham Ling SSSI sit either side of the Angles Way. None of this is background scenery — it's what this part of the village has instead of street lighting or pavements, walked every day. None of it appears as a cost anywhere in National Grid's response: not the loss to home and business values along the route, not the noise, dust and haul-road disruption of construction next to centuries-old buildings, for a village with no bypass and nowhere else to go while it's built. The Opportunities Plan is not mitigation National Grid's own document admits the draft opportunities plan, even delivered in full, "would not materially change the ES assessment of landscape and visual effects" (para 2.4.1), and that no landowner has even been approached about any of it (para 2.6.1). Tree planting and support for the WaLOR wetland project do nothing to hide a 50-metre pylon. This is a sketch of things that might happen on land National Grid doesn't own, not a plan. The Waveney Valley Alternative was dropped before it was properly tested National Grid withdrew its own 2 km undergrounding offer, citing ground conditions and cost. I don't accept ground conditions were ever the real barrier — National Grid is currently boring tunnels under central London and under the Thames itself at Tilbury, the very endpoint of this project. A company doing that has the technology for a Norfolk field. This was a cost decision. But I don't think a number is the point. No cost should be allowed to outweigh the emotional and mental toll on the people who live with this permanently. This is a national project meant to benefit everyone; it shouldn't be built by loading its whole burden onto one small village because that was cheaper. And even setting cost aside, 2 km was never enough — it would only have moved the pylons to the edge of the village at RG84, still leaving RG82 and RG83 overhead behind Darrow Lane. Anything short of clearing the village fully isn't a solution. Flat ground, and the Holford Rules Before this Project, the church tower was the tallest thing on the skyline here. There's no woodland or landform anywhere along this stretch to break up a 50-metre structure — exactly the "open, agricultural, big sky landscape" the village's own Neighbourhood Plan describes at Key View 28. National Grid claims the route follows Holford Rules 2, 4 and 5. Looking at the ground, that doesn't stand up. What I'm asking the Examining Authority to do - Treat Action Point 27 as still unresolved for Roydon — National Grid's own document (para 2.8.4) admits no agreed position has been reached. - Stop accepting "ground conditions" as an excuse. Weigh the emotional and mental cost to this village against whatever this project costs to do properly — it never has been. - Keep undergrounding on the table, but only if it clears the whole village, not just to RG84. - Keep re-routing on the table — nothing is fixed until the Secretary of State decides, and this is already the third proposal for this stretch. - Do not accept what is currently on offer. It is not a fair trade for what this village has built and looked after for generations.
Fordham Parish Council [REP6-148]	Speaking of smoke and mirrors, NG’s list and suggested “opportunities” are laughable. Rather than re-write, I will copy in Rosie Pearson’s views. • NG proposes new scrub, woodland and grassland in the Woodland Trust area already managed for exactly that. • Likewise, NG proposes 'connective green infrastructure' on the Fordham Estate, which is already managed for meadowland and woodland by the Woodland Trust and is public access. • The Colne Valley maps contain random arrows that point meaninglessly at areas and associate them with the Local Nature Recovery Strategy. • Meanwhile, the map does not show that the Roman River Corridor is in Colchester's Draft Local Plan as both an Essex LNRS nature opportunity and as green/blue infrastructure. • The map shows recommended tree planting in an area that has planning permission for 150+ houses. • The map shows a stretch of Rectory Road, Aldham which could see 'connective green infrastructure enhancements' but it is a quiet country lane with hedgerows already. • Likewise, it appears to show that New Road offers the same opportunity but it's a road with trees and hedges all along it Basically, NG wants to put in what already exists. Obscure the pylons with hedges but in doing so will also block views of the Colne valley and lose the wide, open nature of the area which is one of its greatest characteristics. In their “opportunities” NG doesn’t mention the woodland Trust, tree planted area that will be destroyed around pylon TB046. Three acres of young woodland is likely to be dug up and lost.
Geoffory H Lazell [REP6-200]	I am writing on behalf of the Lazell household to register my comments in relation to Appendix ‘A’, Action Point 27, Waveney Valley (including Snow Street, Roydon Fen and Wortham Ling) – Draft Constraints Plan. I will take each point in turn in numerical order as set out in the text accompanying the map on page 10 of the plan. 1. As admitted, the PRow network north of Snow Street will suffer from widely open and uninterrupted views of several pylons. Indeed, pylon RG80 will stand directly facing anyone walking along the public footpath heading north from Snow Street, completely dominating the skyline. 2. Agreed. 3. This is untrue. The view east from the ‘Fen Railway’ does indeed include vegetation, but this is not high enough to fully ‘filter’ the unfolding view of pylons RG85, 86 and 87. As trains progress in an easterly direction and then northerly around the

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	curved track, passengers in the open carriages will be subjected to an inescapably obstructed skyline. Pylon RG85 will lie some 275 metres directly ahead, with RG86 approximately 300 metres further on and RG87 more distant. As trains round the curve, pylon RG84 will loom ahead and to the right at a distance of some 330 metres, although this may be partially obscured by vegetation during the summer months only. As can be easily envisaged in the photograph – pylon RG85 would stand almost directly ahead of the locomotive, its full height of 50 metres clearly visible, along with its supported cables on either side dominating the skyline. 4. Removal of any vegetation in this ecologically sensitive location is unacceptable. Reinstatement will inevitably take a long time to mature. Visitors to this important heritage asset (Bressingham Steam Museum & Gardens) have the right to enjoy its tranquil rural setting and unblemished valley views. 5. Again, it is disingenuous to claim that “Layers of vegetation filter views” when in fact so much of it is at ground level and therefore cannot possibly obscure such prominent structures as 50 metre-high pylons. 6. Agreed. 7. The proposed WaLOR project to reinstate the natural fenland as part of a future flood prevention scheme cannot possibly be compatible with the installation of either concrete bases for pylons or indeed with underground cabling. This alone must clearly indicate that the proposed transmission line should ideally be located offshore, or at least redirected to the east of Diss, adjacent to the existing overhead line. 8. The project would indeed be visible from parts of Wortham Ling, with claimed ‘vegetation filtration’ having a very limited effect. This SSSI will remain irreparably damaged by the installation of pylons in its close proximity and no amount of ‘tree planting opportunities’ will mitigate this. In fact, Wortham Ling’s status as a SSSI is based largely on its landscape of ‘dry heath and open heathland’ and it is doubtful that Natural England would permit the planting of trees in any event. This effectively renders the accompanying ‘Draft Opportunities Plan’ invalid. 9. This is a fallacious statement, risible in the extreme and absolutely typifies National Grid’s total absence of any concern for rural environments or heritage assets. It pays scant regard to the high level of visual harm that will be inflicted upon Roydon Fen LNR. Wortham Ling SSSI, Roydon Church or all the other view points around the valley. Yes, the project does indeed cross the shallow River Waveney Valley obliquely and whilst the cables will not pass directly over Roydon Fen or Wortham Ling, they will nonetheless pass through the narrow gap (approx. 315 metres) between the two designated areas. As such, despite being referred to as ‘constraints’, both will be subjected to unmitigated and unfiltered close visual damage. Despite National Grid’s claim in bullet point 9 that this deviation is in accordance with Holford Rules 2, 4 & 5, this is not entirely true. Rule 2 states, “Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction.” The convoluted passage of these pylons across the wider Waveney Valley involves no less than 7 direction changes and associated ‘angle towers’. Rule 2 further states, “Some areas (e.g. Site of Special Scientific Interest) may require special consideration for potential effects on ecology (e.g. to their flora and fauna).” Clearly, there is no meaningful ‘special consideration’ being afforded in this case. 10. Again, the Holford Rules are not being adhered to. Roydon’s Grade I Listed church of St Remigius enjoys a panoramic view across the valley from its elevated position on the northern slope. Notes on Rule 2 state, “Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.” Pylons RG85 to RG92 will be plainly visible from the churchyard – indeed they will dominate the entire view to the west and south. This photograph shows the view from the church to the southwest across the Waveney Valley. The pylons will pass from right to left in the near distance, creating a devastating domination of this pristine landscape and its fragile ecology. 11. Whilst this claim of ‘largely filtered and screened views’ may be partially true in respect of some (but not all) properties to the north of the A1066 Roydon High Road, this is not the case for many of those lying to the south of this major access route between Thetford and Diss. Nor is it true in regard to properties lying on the western side of Hall Lane, Roydon, which has been omitted from this ‘Constraints Plan’ altogether, for some unknown reason. This lane runs in a southerly direction from the western end of Snow Street, parallel and adjacent to pylons RG82 – RG84 at an average distance of around 180 metres, with the closest property being a mere 115 metres from the pylon line. A sightlines diagram, centred on this property is included in this submission, which clearly shows that ‘vegetation filtration’ is entirely dependent on both height and distance, is seasonal and locally variable over just a few metres. It is not always a reliable defence against visual harm caused by dominant and intrusive high structures. Summary. In the same way that the AONB that is Dedham Vale is deserving of an alternative to pylons and overhead transmission lines, so must be the SSSI of Wortham Ling, the LNR of Roydon Fen, the wildlife corridor along the Waveney Valley, the Grade I Listed Roydon Church and the numerous Grade II Listed residential properties which abound in this area. Indeed, National Grid (NG) recognised the environmental, ecological and historical importance of this area when it proposed “The Waveney Valley Alternative” of undergrounding for a short distance across the central part of the valley. Once it was realised that the proposed 2 km length was woefully inadequate to fully mitigate the threatened harms and that at least 8.5 km was needed (from pylons RG75 – RG102) if the safety of Wortham Airstrip was also to be preserved, the plan was quickly dropped, without any consultation process being offered. This was proof – as if any were needed – of NG’s arrogant disdain for the people and wildlife who call this valley ‘home’. The proffered excuse of “unsuitable soil conditions” was treated with considerable scepticism. It is noteworthy that there is no mention in bullet point 4 of the ‘Constraints Plan’ of the impact the pylons will have (particularly RG85) on the ‘Heron Meadow Centre’. This relies heavily on its natural setting in the valley to provide its healing and learning functions, thus is highly likely to face closure should either pylons or a short section of underground cabling be installed. Again, this harsh fact lends weight to the argument that the existing transmission corridor to the east of Diss should be utilised, preferably by underground HVDC cabling or at worst, by pylons to be constructed at a safe distance from the existing line. Due to its proximity to the A140 trunk road, this option would obviate the need for a great many of the proposed ‘haul roads’ needed for the construction phase and also provide easier access for maintenance during the operational life of the line. Why this appears to have not been seriously considered is a great mystery to many, given that so much of the required infrastructure is already in place. It would certainly meet with far less objections and probably prove to be the least costly option. To conclude this submission, the importance of preserving the Waveney Valley, its numerous natural features and surrounding countryside in its present condition, along with the human and wildlife communities which populate it cannot be overstated. To effectively surround Roydon on three sides with 50 metre-high lattice steel monstrosities, to the total exclusion of all the alternatives and in direct contravention of the ‘Holford Rules’ and ‘Treasury Green Book’ would be an act of Government-sanctioned vandalism. It is incumbent therefore upon His Majesty’s Planning Inspectorate to protect this corner of our green and pleasant land, not just for us but for the generations to come.

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Gillian Ann Whittle [REP6-201]	National Grid has issued a paper entitled “Document: 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans” – Planning Inspectorate Reference: EN020027. Appendix D is supposed to show opportunities close to the EACN at Ardleigh, and purporting to set out plans to introduce tree planting and other mitigants. The owners of the Grade 2 Listed Heritage Asset, Farm, situated in Hungerdown Lane, Ardleigh, and with a boundary just 10 metres away from National Grid’s boundary (order limits) are, once again, extremely concerned to note the lack of any form of realistic mitigation. Farm is shown as having a border of woodland on two of its boundaries – this is correct, and was planted by the current owners approximately 35 years ago. However, it should be noted that the trees are 95% deciduous, and will provide no protection against noise pollution during the winter months. They will also provide no mitigation against the five 50 metre high pylons that will loom over this Grade 2 Heritage Asset (Pylons TB1, TB2, TB3, TB4 and TB5). And this is after National Grid has referred to Farm in its Vol.6 Environmental Statement, 14.7 Operational Noise Assessment, P. 9 of 22 as “the worst affected receptor.” The proposed EACN substation is shown on National Grid’s “Action Point 27: Ardleigh and Little Bromley – Draft Opportunities Plan” as being surrounded by the EACN Environmental Area. As this Environmental Area is immediately opposite, extremely close to and in full view of the Grade 2 Heritage Asset, Farm, the EACN Environmental Area should be specifically stated. To call it just the “EACN Environmental Area” and to show a pretty picture with green colouring is far too woolly. Heading north from the proposed EACN Substation site, and directly towards the wood belonging to the Grade 2 Heritage Asset, Hungerdowns, there is an arrow which indicates “opportunities for links to local nature recovery strategy, strategic areas.” This will directly take in the land belonging to a business, Holly Tree Nurseries. Has any effort been made to consult with the owners of this business? Have they been made fully aware of NG’s proposed plans? It is highly unlikely. Heading north east from the north east corner of the wood belonging to Hungerdowns there is an arrow which indicates “opportunities for connective green infrastructure enhancements.” What a curious form of mitigation! Is National Grid aware that this area of Hungerdown Lane consists of 3040 individual properties? These properties mostly already have mature hedges facing the lane, and it is difficult to see what further mitigation NG is proposing. If NG proposes to place “connective green infrastructure” further away from the lane this seems ambitious, if not impracticable. It would require negotiating with 30-40 landowners to give up part of the back gardens, so that the “connective green infrastructure” could be created. In addition some of the owners run businesses from the properties, such as organic vegetable supplies and equestrian centres. This strongly suggests that NG has failed to do any credible research. Furthermore the Grade 2 Heritage Asset, Farm, situated with a boundary of just 10 metres from NG’s boundary and surrounded on nearly 3 sides by NG’s boundary, has been offered no such mitigation. The site of Farm is immediately opposite, extremely close to and in full view of NG’s proposed EACN substation. What mitigation is NG proposing to offer to the owners of Farm, and why has it not been included in the “Action Point 27: Ardleigh and Little Bromley – Draft Opportunities Plan?” It would seem to the owners of the Grade 2 Heritage Asset, Farm, that NG has made no serious attempt to respond to the Inspectorate’s request. Where is the communication and so-called consultation from NG to explore opportunities and mitigation? Where is the desire to engage with communities that NG would seem so eager to promote? Again, the suggestion is that NG has failed to do any credible research either for the Grade 2 Heritage Asset, Farm, or for the 30-40 landowners further to the north in Hungerdown Lane. It would appear that the preparation of the master plan by NG is nothing more than a box ticking exercise, and that, once again, NG is showing the typical arrogance and lack of consultation that has been apparent throughout the whole of the Norwich to Tilbury process. Properly thought-out biodiversity enhancements and mitigation are essential in relation to this project. Put quite simply, NG needs to return to the drawing board.
Jackie James [REP6-206]	The draft plan presents a number of environmental enhancements which, on closer examination, are either existing habitats, existing management by third parties, or projects already being undertaken by others. As a result, the plan gives the impression of delivering environmental gain where little or no genuine additional enhancement is actually proposed. Section 2.6.1 appears to undermine the credibility of the Draft Opportunities Plan, as it acknowledges that many of the proposed opportunities are on land owned or managed by third parties who have not agreed to these proposals. The reality is they haven’t proposed anything of genuine new enhancement to the environment. 2. The map is such poor quality it is hard to read, even for those who know the area! 3. The map is misleading, it does not show the full extent of Woodland Trust land and, as such, makes it look like NG are proposing enhancements in areas not already being maintained by the WT. 4. Does the title ‘Draft Opportunities Plan’ indicate that a more detailed plan will be produced for consultation? The current plan is extremely vague and provides insufficient detail for meaningful consultation. Furthermore, does the repeated use of the term ‘opportunities’ indicate that these measures are merely potential options rather than firm commitments? If so, what criteria will National Grid apply in deciding whether these opportunities are actually delivered, and what guarantees are there that they will be implemented? For example, what is meant by ‘Opportunity for links to LNRS strategic area’ and ‘Opportunities for connective blue infrastructure’? 5. The ‘Opportunity for connective green infrastructure enhancements’ areas shown on the map already have hedgerows so it’s not an opportunity as it already exists. 6. Areas 1 and 2 detailed on map as ‘Opportunities for areas of native woodland, trees, shrub, wildflower grassland’ are already within and the Woodland Trust area of land and being managed by them in this way. 7. The flood plain area near to Fordham bridge marked as ‘Opportunities for connective blue infrastructure’ has already been developed, with scrapes, ponds, channels and lowering of riverbanks to reduce the risk for flooding and increase biodiversity through establishment of wetlands. The aim of the Woodland Trust is to achieve official designation. 8. The area marked as an ‘Opportunity for tree and hedgerow planting’ already has some hedgerow, but the remaining area is open that allows for travellers to enjoy the wonderful views across the valley. Creating a hedge would further block the views that are already to be blighted by pylons and further change the character of this beautiful part of the village. 9. If NG plant hedgerows along roadsides, do they intend to maintain those hedgerows to prevent growth and obstruction onto the highways? 10. There needs to be communication with Fairfield Farms as hedgerow planting appears to occur in an area where they have laid pipes and sunk infrastructure which connects with the agricultural reservoir. 11. The plans do not identify where existing hedgerows and mature trees will be removed as part of pylon construction, nor do they make clear whether the proposed “opportunities” are intended simply to compensate for habitats that National Grid itself will destroy. If this is the intention, the plans should state this explicitly. Furthermore, the use of the word ‘restore’ is misleading. Once mature trees, established hedgerows and long-established habitats are removed, they cannot be restored within any meaningful timescale. Newly planted trees and hedgerows cannot replicate the ecological value, biodiversity, landscape character or visual screening provided by mature vegetation for many decades. Any proposals should therefore distinguish clearly between genuine restoration and replacement planting.

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John and Linda Fisher [REP6-211]	We've looked at the nature opportunity maps for Fordham and Aldham that fall within the Colne Valley, an area of natural beauty that NG intends to decimate. We live in a wildlife corridor, with reservoirs home to multiple wildlife to include migrating water birds etc, the intended pylons will now obstruct the flight paths of all landing wild fowl, who knows what devastation they will cause. Further points: • NG - They have not talked to landowners, Parish Councils or local people! • NG proposes new scrub, woodland and grassland in the Woodland Trust area already managed for exactly that. • Likewise, NG proposes 'connective green infrastructure' on the Fordham Estate, which is already managed for meadowland and woodland by the Woodland Trust and is public access. • The Colne Valley maps contain random arrows that point meaninglessly at areas and associate them with the Local Nature Recovery Strategy. • Meanwhile, the map does not show that the Roman River Corridor is in Colchester's Draft Local Plan as both an Essex LNRS nature opportunity and as green/blue infrastructure. • The map shows recommended tree planting in an area that has planning permission for 150+ houses. • The map shows a stretch of Rectory Road, Aldham which could see 'connective green infrastructure enhancements' but it is a quiet country lane with hedgerows already. • Likewise, it appears to show that New Road offers the same opportunity but it's a road with trees and hedges all along it. Also, NG intends to apply for planning permission to change the landscape to prepare for the pylons when planning permission has not even been granted - it makes you wonder if this is a 'done deal' and that everyone is wasting time, energy and stress going through the motions Baseline surveys were undertaken to establish whether the overhead line would interfere with routes routinely used by birds the surveys did not show any strong flight paths at a height where birds would be at risk of collision with the overhead line.
Martin Orpen [REP6-216]	<i>Colne Valley (Fordham, Ford Street and Aldham)</i> I have lived in Aldham for over twenty years and have a detailed knowledge of the local landscape. I also volunteered with the Woodland Trust, surveying and recording veteran and notable trees for the Ancient Tree Inventory. My observations are therefore based on both long-term familiarity with the area and the published documents referred to below. Having reviewed National Grid's Constraints and Opportunities Plans for the Colne Valley (Fordham, Ford Street and Aldham), I remain unconvinced that they represent the coordinated masterplans requested by the Examining Authority. The Constraints Plans demonstrate a reasonable understanding of the environmental assets present within the area. However, the accompanying Opportunities Plans appear generic and, in several instances, disconnected from the existing management of the landscape. <i>Existing landscape management appears to have been overlooked</i> The Woodland Trust has owned and managed the Fordham Hall Estate for many years. Its published Management Plan already includes long-term objectives for woodland creation, species-rich grassland, habitat connectivity, public access, permissive routes and community engagement. The Opportunities Plan proposes many of these same measures without acknowledging that they are already established management objectives or, in many cases, have already been implemented. For example, the Plan proposes woodland, scrub and grassland creation within areas already managed by the Woodland Trust for exactly those purposes. Likewise, "connective green infrastructure" is identified across areas where landscape-scale habitat connectivity has already been a long-term management objective. This raises the obvious question of whether existing management plans were reviewed before the Opportunities Plan was prepared. <i>Opportunities appear generic rather than place-specific</i> Several proposals appear difficult to reconcile with the existing landscape. Examples include: proposed "connective green infrastructure enhancements" along rural lanes that already possess mature hedgerows and established tree cover; proposed habitat enhancement within areas already managed for nature conservation; tree planting shown in locations where residential development already has planning permission; broad arrows referencing the Local Nature Recovery Strategy without explaining their purpose or relationship to the surrounding landscape. These examples suggest that the Opportunities Plan has not been developed from detailed local knowledge. <i>Veteran trees</i> The Constraints Plan identifies only a limited number of veteran trees and makes no reference to notable trees that will become the veteran trees of the future. This is surprising for a project that will remain within the landscape for many decades. In addition, comparison with the Woodland Trust's Ancient Tree Inventory suggests that at least one distinctive pair of veteran oaks may have been plotted in a different location from their recorded position. If confirmed, this should be corrected, as accurate mapping of veteran trees is fundamental to understanding environmental constraints. <i>Missed opportunities</i> The Colne Valley already benefits from extensive published environmental planning, including: the Woodland Trust's Fordham Hall Estate Management Plan; Aldham Parish Council's detailed assessment of the landscape, heritage and Public Rights of Way; the Local Nature Recovery Strategy; existing habitat restoration initiatives. Rather than building upon this substantial body of work, the Opportunities Plan appears to rely largely on generic landscape enhancement measures that could be applied almost anywhere.

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	<i>Conclusion</i> Action Point 27 requested coordinated masterplans identifying opportunities associated with landscapes affected by the Project. In my view, the Colne Valley Opportunities Plan does not yet fulfil that purpose. It identifies relatively little that is genuinely new, appears to duplicate work already undertaken by organisations such as the Woodland Trust, and misses an opportunity to build upon the considerable environmental knowledge and long term stewardship that already exists within the Colne Valley. I respectfully invite the Examining Authority to consider whether the Opportunities Plan should be revised to demonstrate that existing local management plans, environmental strategies and community knowledge have been fully taken into account. <i>[Applicant note: Appendices provided with REP6-216 comprising Woodland Trust Fordham Hall Estate Management Plan 2017-2022, Aldham Parish Council Statutory Consultation Response July 2024, Ancient Tree Inventory map – these are not replicated for the purposes of this response however they are acknowledged by the Applicant]</i>
Sir Bernard Jenkins (MP) [REP6-235]	Masterplans: For the avoidance of doubt, the proposals set out in “Document: 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans” are not supported in respect of the Colne Valley. They show a lack of due diligence by the Applicant. Areas suggested for meadow land or woodland already are meadowland and woodland under the Woodland Trust’s management. Existing environmental assets cannot be presented as mitigations. Areas suggested for green connectivity are country lanes with hedgerows, which already provide green connectivity. In the Fordham Valley tributary of the Colne, adding a couple of small pockets of woodland and a hedgerow to hide the valley and prevent it from being viewed from the road does not represent an improvement; on the contrary, it is tantamount to vandalism. The open nature of this valley and the far-reaching views afforded to those transiting through it are among its best features and need to be protected. The green areas within the Valley are already interconnected. It is the pylons which are the issue, not the natural landscape. Only undergrounding can improve these proposals in the Colne Valley. I do not advocate rerouting the pylons proposal to any other areas, except offshore. However, failure to consider alternative routes to avoid siting EACN at Ardleigh and to avoid the Dedham Vale altogether would also protect the Colne Valley. This is a further flaw in this application and is why it should be refused. The Colne Valley is just one part of a 180km linear infrastructure project. It is clear that it meets the tests for undergrounding. However, the enormous harm caused to the rest of my constituency, particularly the village of Ardleigh, and the entire region, by the proposed overhead lines could be avoided through a grid upgrade using high-capacity conductors, offshore coordination or HVDC undergrounding. Given the harms of the Applicant’s proposed transmission solution and the benefits of the alternatives, the Secretary of State cannot approve this Development Consent Order.
Maxine Suter [REP6-217]	I am writing as a resident of Roydon. I manned the stalls we ran at Roydon Village Hall and on Darrow Lane for our own community survey on the Waveney Valley Alternative — full day shifts, talking to whoever came through. Nearly the whole village told us they use and value Darrow Lane, Roydon Fen and Wortham Ling, and the overwhelming majority wanted this section undergrounded. National Grid's Appendix A doesn't reflect any of that. **What's actually at stake** This route changes direction as it crosses the village. [RESIDENT'S OWN KNOWLEDGE, NOT FROM A NATIONAL GRID DOCUMENT: it turns at RG81, RG82 and RG83 run behind Roydon parallel with Darrow Lane, RG84 sits at the edge of the village on the A1066, then it turns again to cut across the valley to RG92, with RG88 towering directly between Roydon Fen and Wortham Ling.] That's at least three direction changes through one small village, on ground National Grid's own plan admits has almost no cover. Along that route sits St Remigius Church (Grade I listed), a cluster of Grade II buildings on Snow Street, and The Gables on Darrow Lane, a 17th-century timber-framed house. South of the village, Roydon Fen LNR and Wortham Ling SSSI sit either side of the Angles Way. None of this is background scenery — it's what this part of the village has instead of street lighting or pavements, walked every day. None of it appears as a cost anywhere in National Grid's response: not the loss to home and business values along the route, not the noise, dust and haul-road disruption of construction next to centuries-old buildings, for a village with no bypass and nowhere else to go while it's built. **The Opportunities Plan is not mitigation** National Grid's own document admits the draft opportunities plan, even delivered in full, "would not materially change the ES assessment of landscape and visual effects" (para 2.4.1), and that no landowner has even been approached about any of it (para 2.6.1). Tree planting and support for the WaLOR wetland project do nothing to hide a 50-metre pylon. This is a sketch of things that might happen on land National Grid doesn't own, not a plan. **The Waveney Valley Alternative was dropped before it was properly tested** National Grid withdrew its own 2 km undergrounding offer, citing ground conditions and cost. I don't accept ground conditions were ever the real barrier — National Grid is currently boring tunnels under central London and under the Thames itself at Tilbury, the very endpoint of this project. A company doing that has the technology for a Norfolk field. This was a cost decision. But I don't think a number is the point. No cost should be allowed to outweigh the emotional and mental toll on the people who live with this permanently. This is a national project meant to benefit everyone; it shouldn't be built by loading its whole burden onto one small village because that was cheaper. And even setting cost aside, 2 km was never enough — it would only have moved the pylons to the edge of the village at RG84, still leaving RG82 and RG83 overhead behind Darrow Lane. Anything short of clearing the village fully isn't a solution. **Flat ground, and the Holford Rules** Before this Project, the church tower was the tallest thing on the skyline here. There's no woodland or landform anywhere along this stretch to break up a 50-metre structure — exactly the "open, agricultural, big sky landscape" the village's own Neighbourhood Plan describes at Key View 28. National Grid claims the route follows Holford Rules 2, 4 and 5. Looking at the ground, that doesn't stand up. **What I'm asking the Examining Authority to do**- Treat Action Point 27 as still unresolved for Roydon — National Grid's own document (para 2.8.4) admits no agreed position has been reached.- Stop accepting "ground conditions" as an excuse. Weigh the emotional and mental cost to this village against whatever this project costs to do properly — it never has been.- Keep undergrounding on the table, but only if it clears the whole village, not just to RG84.- Keep re-routing on the table — nothing is fixed until the Secretary of State decides, and this is already the third proposal for this stretch.- Do not accept what is currently on offer. It is not a fair trade for what this village has built and looked after for generations. Roydon, Norfolk

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Norfolk County Council [REP6-158]	-Compensation and the mitigation hierarchy NCC has set out its position on the issue of compensation and the mitigation hierarchy in a number of written submissions including in NCC's relevant representation [RR-2753] at paragraphs 4.44.6, 10.16-10.17 and 10.19-10.21 in NCC's local impact report [REP1-173] at paragraphs 11.24-11.32, and most recently in NCC's answer to question GEN 2.2 of ExQ2 [REP5-256]. -Masterplans [REP5-199] (and reference to specific areas covered by the masterplans) NCC considers that the Waveney Valley constraints and opportunities plan (found at Appendix A of [REP5-199]) is a useful contribution to the possibility of compensation which addresses major and significant landscape harms through a contribution to access improvements, green and blue infrastructure, and interventions anchored in the local nature recovery strategy. NCC continues to disagree with the applicant's position that compensation is not needed. NCC has worked with SCC to provide the applicant with a draft schedule to a S106 agreement which would secure a financial contribution to be used for suitable interventions and we await comment from the applicant. NCC and SCC have also provided the applicant with a CIL compliance statement which justifies the request for compensation for landscape impacts on the Waveney Valley against the tests set out in the Community Infrastructure Levy Regulations 2010.
North-West and South-West of Chelmsford Parishes Group [REP6-159]	4. Deliverability The Group's representative drew attention to some complexities and uncertainties about deliverability. These include: • The Applicant's stated position that it would only entertain such measures if specifically required by the Secretary of State (see [REP5-199], para. 2.5). The Applicant showed no willingness to implement such measures otherwise. • Land ownership: the Applicant explained that much of the land required is in third party ownership, which could affect deliverability (see [REP5-199], para. 2.6). • Cost and effectiveness – for instance that agreed funding may prove to be insufficient; and that new planting may fail due to weather conditions. These complexities/uncertainties lead the Parishes Group to be dubious about the success of such measures. 5. Policy Basis The Group understands that the policy basis for such measures includes EN5, para 2.10.6. However, the Group holds that earlier stages of the Mitigation Hierarchy have not been sufficiently pursued by the Applicant; and that doing so would be more effective in reducing the level of harm caused the Project. These earlier stages include para 2.10.1 (routing and avoidance) and 2.10.5, bullet point 3 (rationalisation and undergrounding of existing infrastructure in the vicinity). In the case of both Great/Little Waltham and Ingatestone/Buttsbury, the Parishes Group has advocated the case for a route to the east and south of Chelmsford, enabled by selective undergrounding of the existing 132kv OHL. In the case of Great/Little Waltham, there is an additional opportunity (the 'west of Great Waltham alternative) to divert the route so that the heritage harms would (by the Applicant's own admission) be significantly reduced (see [APP-122], para. 9.2.4). For this reason, we suggested that the Applicant clarifies the cost of the additional 1.36km of OHL that would be required to implement the 'west of Great Waltham alternative' so that the cost can be compared with the that of the suggested landscape enhancements in the masterplans. 7. Great & Little Waltham Constraints Plan • The Constraints Plan does not present a comprehensive schedule of identified constraints. Several of the numbered points are not constraints at all, but describe elements of the proposed design or mitigation (for example, points 4 and 8). This blurs the distinction between existing environmental constraints and design responses. • Point 2 seeks to describe the visual effects on Great Waltham but omits an important heritage consideration. It fails to acknowledge that the proposed pylons would form a backdrop to Great Waltham when experienced from the wider Chelmer Valley and on approaches from the north. The statement that views are "largely filtered and screened by existing buildings and vegetation" considers only views from within the conservation area. It does not address the wider setting of the conservation area, the valued Chelmer Valley landscape, or the relationship between the valley, the village and the landmark Grade I church tower. • Point 9 states that the route seeks to avoid constraints "in accordance with Holford Rules 2 and 3". However, Holford Rule 2 requires routes, where possible, to minimise effects on the setting of areas of architectural, historic and archaeological interest, including Conservation Areas, Listed Buildings and Registered Parks and Gardens. The Constraints Plan appears only to consider avoiding direct impacts on designated assets rather than the wider effects on their setting. In our view, the alternative route to the east of Chelmsford would have better satisfied Holford Rule 2. • Holford Rule 3 promotes the most direct route whilst seeking inconspicuous locations for angle change towers. It is unclear whether towers TB135, TB143 and TB144 are proposed as angle towers. In any event, their location cannot reasonably be described as inconspicuous, given their prominence in views across the Chelmer Valley, where they would form the backdrop to Great Waltham and its landmark Grade I church tower. 8. Great & Little Waltham Opportunities Plan It is understood that the Opportunities Plan sets out aspirational opportunities for enhancements and not mitigation. While this may be its intended purpose, there is no explanation of how the proposed measures relate to, or compensate for, the residual adverse effects of the scheme. A clearer approach would be for the Constraints Plan to identify the residual effects following embedded mitigation, with the Opportunities Plan then demonstrating how proposed compensatory or enhancement measures address those effects.

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	It is also unclear: • how realistic the proposed opportunities are; • how they would be delivered in practice; • who would be responsible for their implementation; and • what long-term management and aftercare arrangements would be secured to ensure their establishment and ongoing effectiveness. 9. Ingatestone and Buttsbury Similar comments apply to the Ingatestone and Buttsbury plans. Several of the numbered points describe characteristics of the proposed scheme or assertions regarding its limited visual effects (for example, that the undulating landform screens or filters views), rather than genuine environmental constraints. Consequently, there is no clear or transparent relationship between the identified constraints and the opportunities subsequently proposed. There is no mention of the setting of Buttsbury church and more open views from the east-west rights of way where the pylons would be seen on the skyline. 10. Also, the Constraints Plan notes are muddled and conflate mitigation and statements about effects. They do not highlight residual effects, and as a consequence, there is no logical justification for the enhancement and compensatory measures shown on the Opportunities Plans. This lack of transparency makes it difficult to judge whether the proposed opportunities are responding to the correct issues, and whether they are proportionate or capable of compensating the harm. 11. More generally, the Applicant states that "appropriate mitigation has already been incorporated into the Project development through route selection". The Parishes Group does not agree with this conclusion, as it considers that the alternative route to the east of Chelmsford would give rise to materially less harm. Consequently, the inclusion of broadly expressed enhancement or compensatory measures should not be relied upon to diminish the significance of residual adverse effects where those effects could have been substantially avoided through an alternative route selection. Appendix F - Great and Little Waltham -13 PRow are impacted and shown on the Constraints Plan, although they are not numbered/referenced. -Although item 1 makes reference to the PRow within Langleys, those closer to the pylons are not. -Having walked these routes, the views from the Saffron Trail and the Essex Way would not be 'largely filtered by vegetation'. -Also views to the Project from within Great Waltham would not be largely filtered and screened by existing buildings and vegetation. A significant number of properties, the recreation ground and a number of PRow, look across and down to the body of water indicated. The opportunities for enhancements noted along the watercourse are not going to negate the views and height of the pylons. -This same principle would apply to Little Waltham, especially from the north of the village looking south. -In addition, the close proximity of the Langleys RPG and ancient woodland habitat are not going to be negated by 'enhancements along the watercourse'. Appendix G - Ingatestone and Buttsbury - In Ingatestone & Fryerning and Margaretting Parishes, 8 PRow are impacted. - Although Ingatestone (and its conservation area) are certainly a distance from the pylon line (with the railway line intervening), the north end of the village is however open to pylons TB187 to TB190, and the Opportunities Plan indicates nothing to enhance the landscape. -The suggested tree and hedgerow planting and enhancements along the River Wid are unlikely to offer great benefits to those using Footpaths 4 and 40, Stock; 17 and 32, Mountnessing; and 41, Ingatestone and Fryerning. Nor would much benefit be provided for Ingatestone Hall and the properties along Ingatestone Road. -In addition, the users of Footpaths 34, 37, 38, 39 and 45, Stock would be exposed to the full height of the 50m pylons. The undulating landform on the valley slopes and pockets of woodland and mature trees would not screen and filter some, if any, of the views towards the project. -Item 8 on the Constraints Plan highlights the existence of a network of lanes and PRow within the River Wid valley. Although the valley is broad and shallow the line of 50m high pylons will be seen to stretch across this low-lying landscape. Conclusion 15. Based on the points raised above, the Parishes Group concludes that the mitigation measures outlined in [REP5-199] would have little, if any, positive effect in mitigating the harms arising from the Application. The Group also maintains its strong conviction that earlier stages of the Mitigation Hierarchy (particularly EN5, para. 2.10.1) have not been sufficiently pursued by the Applicant; and that this would be more effective in reducing the level of harm.
Paul John Whittle [REP6-222]	National Grid has issued a paper entitled “Document: 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans” – Planning Inspectorate Reference: EN020027. Appendix D is supposed to show opportunities close to the EACN at Ardleigh, and purporting to set out plans to introduce tree planting and other mitigants. The owners of the Grade 2 Listed Heritage Asset, [redacted] Farm, situated in Hungerdown Lane, Ardleigh, and with a boundary of just 10 metres away from National Grid’s boundary (order limits) are, once again, extremely concerned to note the lack of any form of realistic mitigation. [redacted] Farm is shown as having a border of woodland on two of its boundaries as was planted by the current owners approximately 35 years ago. However, it should be noted that the trees are 95% deciduous, and will provide no protection against noise pollution during

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	the winter months. They will also provide little mitigation against the five 50 metre high pylons that will loom over this Grade 2 Heritage Asset (Pylons TB1, TB2, TB3, TB4 and TB5). They provide no mitigation for the actual house forming part of the heritage asset. The proposed EACN substation is shown on National Grid’s “Action Point 27: Ardleigh and Little Bromley – Draft Opportunities Plan” as being surrounded by the EACN Environmental Area. As this Environmental Area is immediately opposite, extremely close to and in full view of the Grade 2 Heritage Asset, [redacted] Farm, the EACN Environmental Area should be specifically stated. To call it just the EACN Environmental Area” and to show a pretty picture with green colouring is far too woolly. National Grid has previously conceded that they see no possible way of mitigating the impact on [redacted] Farm, which is a Heritage Asset. The owners of the property have proposed that the EACN be moved some 300 metres to the east, which would give some relief. However, NG has not responded to this suggestion. Nor have they responded to the suggestion that the EACN substation be built underground to reduce noise. This is despite National Grid’s evidence to the DCO examination document 6.14.A3 which described[redacted] Farm as “the worst affected Noise Sensitive Receptor” affected by the Scheme. It concludes that the specific sound level at [redacted] Farm is predicted to exceed the night time background sound level by 14dB unless mitigation is put in place. There has been no mention of the wirescape that will be completed by the siting of the EACN substation, next to the North Falls and Five Estuaries onshore substations, together with the existing 132kV pylons and power lines feeding the substation at Lawford. Indeed, it is ironic that NG have described the site for the North Falls and Five Estuaries substations as being an area of “mitigation proposals” without explaining what these words mean. Why not be upfront and call the whole area a wirescape. NG is trying to pull the wool over the eyes of the Planning Inspectorate. It has, once again, failed to do any credible research in relation to mitigation for the Grade 2 Heritage Asset, [redacted] Farm. It has seen the preparation of the master plan as nothing more than a box-ticking exercise. NG need to rethink and return to the drawing board.
Penny Lang [REP6-226]	The lack of appropriate Masterplans, as discussed below, is just one of many examples of National Grid’s obfuscation continuing, and failing to provide proper answers when requested to do so either by the Examiners, or by Councils, businesses, IPs, consumers et al. NG’s failure to respond appropriately around the Colne Valley landscape is yet another example. NG has provided limited sketch Opportunity Plans, not Masterplans. Neither Parish Councils nor local landowners have been consulted. The maps are vague and superficial, and many suggestions duplicate existing ecology – see notes below*. The two veteran trees at 21 on the Aldham Map are wrong. They should be at the bend in Tey Rd. I have mentioned many times before the well known importance of wildlife corridors. I now see that habitat connectivity is an established policy of the Woodland Trust with reference to corridors between Chalkney Wood, Hoe Wood Aldham, Fiddlers Wood and Fordham Hall Estate. • * The area is already managed by the Woodland Trust for scrub and woodland • NG proposes 'connective green infrastructure' on the Fordham Estate. The Woodland Trust already manages for habitat connectivity, meadowland, woodland, heritage, public access and recreation. • The map fails to show the Roman River Corridor, which is shown in Colchester's Draft Local Plan as both an Essex LNRS nature opportunity and as green/blue infrastructure. • The Local Nature Recovery Strategy also covers the Colne Valley maps, while NG employs irrelevant arrows. • NG proposes part of Rectory Road, Aldham could see 'connective green infrastructure enhancements' but it is already a quiet country lane with mature hedgerows. • They show that New Road, Aldham offers the same opportunity, but this road also already has mature trees and hedges all along it. • They recommend tree planting where housing planning permission is granted.
Robert Wass [REP6-222]	This clearly hastily scratched together set of basic drawings cannot be seriously contemplated as a mitigation plan. The pylons will be visible along the whole of the Essex Way in this area The Fordham Hall Estate is already a strategically important conservation area, where land is being vegetated and re-wilded. There appear to be no plans for tree & hedgerow planting near Ford Street itself in relation to TB49 & 50. Any such planting would have to be of mature specimens given the scale of the proposed pylons No contemplation of undergrounding has been set out or explained why it should not apply in a regionally significant conservation area. No explanation is given of blue infrastructure enhancements
Roydon Parish Council [REP6-161]	Response of Roydon Parish Council, Norfolk, to National Grid Document: 8.4.12.2: Response to ISH2 Action Point 27 - Masterplans. Planning Inspectorate Reference: EN020027 Roydon Parish Council considers National Grid’s masterplan in relation to the Waveney Valley to be inadequate, poorly thought out and potentially damaging to sensitive landscapes in our village. It fails to understand the nature of the habitats, lanes and neighbourhoods it refers to, and the suggested works actually threaten the future of some of these habitats, including a Site of Special Scientific Interest and a nature reserve. This suggests that National Grid have failed to do any credible research in relation to mitigation in the village, and has seen the preparation of the masterplan as nothing more than a tick-box exercise. National Grid needs to return to the drawing board. We stress that the parish council considers properly thought out biodiversity enhancements and mitigation to be essential in relation to the pylons. Turning to specific proposed remedies for the Waveney Valley. Roydon Fen. National Grid proposes the planting of trees and hedgerows at Roydon Fen. But this is a rare wetland nature reserve, managed by Suffolk Wildlife Trust, where it’s important to control the spread of woodland to preserve the fen’s characteristics. What National Grid is proposing would risk damaging the habitat. Wortham Ling. Similarly, National Grid proposes tree and hedgerow planting at the Ling - a Site of Special Scientific Interest composed of acid grassland and dry heath. The Grid’s proposal again completely fails to grasp the nature of the habitat they’re referring to. Tree planting would fundamentally alter and damage this rare SSSI habitat. Snow Street. The Grid proposes green infrastructure improvements but the western half of the highlighted section is already heavily wooded and / or with hedgerows and we question what additional work could be undertaken. The eastern end is Brewers Green, a County Wildlife Site, which is already managed to protect and enhance specific habitats such as ponds and open grassland. There is no indication of what green infrastructure the Grid is thinking about, but activities such as a significant programme of tree planting would again be considered inappropriate as it could threaten the future of these specific habitats. Route planning: The applicant states in the document that it “considers that appropriate mitigation has already been incorporated into the Project development through route selection, design development, adherence to relevant national policy and guidance including the Holford and Horlock Rules”. But, as Roydon Parish Council has stated in its submissions to National Grid and the Planning Inspectorate, the Holford Rules have been repeatedly ignored in relation to the village - particularly Holford Rule 3. One of the key ways it could have used design development to protect the Waveney Valley, the undergrounding option, was quickly dispensed with by the applicant. The masterplan proposes

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	little relevant mitigation in relation to the 50m pylons to the north of Snow Street, which impact a key view listed in the Diss and District Neighbourhood Plan as well as several popular footpaths. Neither is there any mitigation in relation to pylons impacting the Angles Way footpath in the valley, which they cross, or views of the Grade 1 listed St Remigius Church. The Grid’s suggestion that existing greenery protects views of the church is a falsehood. The parish council points out that we were not consulted in relation to this masterplan. Perhaps if its staff had spoken to us, they would not have made the errors and proposed such potentially damaging solutions in this masterplan.
Russell Matthews [REP6-233]	I am writing as a resident of Roydon in response to National Grid's Document 8.4.12.2, and in particular Appendix A, which covers the Waveney Valley, Snow Street, Roydon, Roydon Fen and Wortham Ling. This is the document National Grid produced in answer to Action Point 27, which the Examining Authority raised because it accepted that Roydon and this stretch of the Waveney Valley are affected badly enough by the Project to need a proper masterplan and an agreed position on compensating for what is left behind once the harm can't be avoided. National Grid's own document admits, at paragraph 2.8.4, that no agreed position has actually been reached. It is now nearly three months since Deadline 5, and what Roydon has is a set of constraints marked on a map and some “opportunities” that National Grid itself describes as unfunded and undelivered. Nothing has been secured. No landowner has been approached, let alone agreed to anything. I want to set out, in this response: why the route runs through Roydon at all rather than somewhere else; what is actually here — the church, the listed buildings, Roydon Fen, Wortham Ling, Darrow Lane — and why it matters to the people who live here; the community's own survey, which tells the Examining Authority far more than National Grid's own document about what local people think; my own point-by- point response to the eleven numbered points on National Grid's constraints plan and the accompanying opportunities plan; and finally, whether National Grid can really say it has followed the Holford and Horlock Rules here, because I don't think the evidence supports that. Why the route runs through Roydon This is not the route National Grid originally preferred. During its 2022 consultation, the preferred corridor ran further west of the village. National Grid's own Corridor Preliminary Routeing and Siting Study records that the route was moved out of that 2022 corridor mainly because of a planning application (2021/0612) for a care and wellbeing business, and that a more westerly “Blue” corridor was ruled out because it would run alongside an SSSI with a water-meadow environment. The move away from that western corridor is also connected to concerns recorded near Bressingham Steam Museum, whose two heritage railway lines crossed the earlier route. The museum's curator, , said publicly: “The proposed route of the pylons will cross two of the museum's railways. There would be serious implications for the future sustainability of the museum if a pylon was to be erected directly on or next to our railway lines. These railways are an important part of steam preservation and Norfolk heritage.” I set this out as part of the documented history of the route, not as any criticism of the museum, which was entitled to raise its own concerns like any other affected party. A resident's written representation to this Examination (EN020027-001344) records that a National Grid representative confirmed at a July 2023 consultation event that the route changed for these reasons. What that meant for Roydon, in National Grid's own words as quoted in the same representation, was “transferring negative impact from St Mary[’s] Church to St Remigius” — moving harm from one Grade I listed church onto another — while increasing the effect on recreational use and the main access to Wortham Ling, and threading the line through a narrow gap between Roydon Fen and Wortham Ling. I raise this because it matters to how Action Point 27 should be judged. The route through Roydon has never been National Grid's preferred choice. There have now been three separate proposals for this section — the original 2022 corridor, the current alignment, and the Waveney Valley Alternative, which was offered, discussed with residents, and then withdrawn. Of the three, the route now proposed causes the most harm to Roydon and to the surrounding environment, and neither the constraints plan nor the opportunities plan offers anything that would offset those losses for the village. National Grid has never published its reasoning for any of these route decisions, despite residents asking for it directly and in writing. What is actually here St Remigius Church, Roydon, is Grade I listed (National Heritage List for England entry 1050237, first listed 7 December 1959) — a Norman nave and round tower, a 13th/14th-century chancel, and a large 15th- century north porch with flushwork panelling. It is one of Norfolk's round-tower churches and stands above the Waveney Valley. At the Examination hearing, a Historic England representative told the Examining Authority: “The pylons will dominate. I think it's not too strong a word — a word I would very rarely use — but they would dominate that and I don't think that's given due weight here. I think we feel the level of harm given to the church from development in its setting is understated.” Historic England's written representation adds that the pylons “compete with the tower in scale and detract from its prominence,” and that National Grid has looked at views from the churchyard but not at the impact on views of the church from across the valley — which is how most people actually see it. Around the church, Roydon has a real concentration of listed buildings: Snow Cottage (List 1050240), Roydon Hall (List 1373311, listed 26 June 1981), Glebe Farmhouse (List 1329809), Limetree Farmhouse, Firtree Farmhouse and The Hermitage — all Grade II on Snow Street — the terraces at 20–21 and 22–23 Snow Street, and the Grade II War Memorial (List 1455938) in the churchyard. On Darrow Lane itself stands The Gables (List 1373310, first listed 7 December 1959) — a 17th-century timber-framed house with the remains of a moat, right on the same lane National Grid's own Point 1 admits has no meaningful screening. South of the village is Roydon Fen — a 17.2-hectare Local Nature Reserve and County Wildlife Site, owned by South Norfolk Council and managed with Suffolk Wildlife Trust since 1994. It is spring-fed fen with marsh helleborine, marsh fragrant orchid and glow-worms, and flint tools around 10,000 years old have been found there. Beyond it is Wortham Ling, a 53.2-hectare biological SSSI (Natural England reference 1005979) of acid grassland and heath, home to skylark, woodlark, nightjar and grayling butterflies — common land preserved, essentially, because it was never good enough to plough, and valued now for exactly that reason. Darrow Lane and Darrow Wood Lane, along with these two sites, are not separate features. Roydon's own Neighbourhood Plan evidence describes a deliberate corridor linking Roydon Fen, Quaker Wood, Brewers Green, Baynard's Green and Wortham Ling — the same places this route crosses or runs beside. National planning policy backs this up directly: the National Planning Policy Framework says that “access to a network of high quality open spaces and opportunities for sport and physical activity is important

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	for the health and well-being of communities” (paragraph 103), and that rights of way should be protected and enhanced (paragraph 105). This is not a marginal amenity. It is exactly what national policy says should be protected. The Waveney Valley Alternative, and what local people actually said The Waveney Valley Alternative was National Grid's own defined option to put around 2 km of this section underground instead of on pylons. National Grid has withdrawn it: its published position states, “For the avoidance of doubt, the alternative design at the Waveney Valley (referred to as the Waveney Valley Alternative) is not being proposed and does not form part of the Project.” The reasons given were ground conditions and cost, “with a requirement to keep costs as low as possible for the bill payer.” Suffolk County Council's deputy cabinet member for nationally significant infrastructure, called the decision not to underground any of the line through the Waveney Valley “contemptible,” and warned it would “wreak untold damage” on the landscape. , the Green MP for Waveney Valley, said it was “incredibly disappointing” that National Grid had “renege” on an earlier commitment to bury cabling around the River Waveney. The Waveney Valley Valued Landscape Assessment, commissioned by Norfolk and Suffolk County Councils and published in April 2024, formally recognises the area as a valued landscape. Because I wanted the Examining Authority to hear directly from the people who actually live here, a group of us in Roydon organised and paid for our own survey on the Waveney Valley Alternative. It was not run by National Grid or any public body — just residents. We went letterbox to letterbox, to every household close to the pylon route in both Roydon and Bressingham, and held two in-person sessions, one at Roydon Village Hall and one on Darrow Lane, so people could fill it in there and then. We sent the full set of results to National Grid as part of the Waveney Valley Alternative consultation. Of 500 surveys handed out, we had 479 responses back — a 95.8% response rate — across eight questions. The results were: • 93% supported the Waveney Valley Alternative and undergrounding through this section. • 469 of 479 (98%) said they enjoy and use Darrow Lane. • 474 of 479 (99%) said they enjoy and use Roydon Fen. • 471 of 479 (98%) said they enjoy and use Wortham Ling. • 82% had not been to a National Grid consultation roadshow — for the same reasons anyone misses an event: health, mobility, work, childcare, or simply not having the time. This is not a substitute for National Grid's own consultation. It reached people directly in their own homes, including residents who for ordinary reasons hadn't managed to get to an event. The strength of the response — essentially the whole village saying they use and value Darrow Lane, Roydon Fen and Wortham Ling — shows these are not background landscape. They are used, every day, by nearly everyone who responded. Going through National Grid's constraints plan, point by point National Grid's Appendix A sets out eleven numbered points on its Draft Constraints Plan. I have gone through all of them. Points 1 to 3 cover the northern approach, around Snow Street. Point 1 admits there are “few hedgerows/field boundary trees” north of Snow Street — in other words, National Grid's own document accepts there is nothing to screen the pylons along this stretch. Point 2 confirms the Project will be visible in close views from Snow Street itself, which is the historic heart of the village described above. Point 3 notes that views east from Bressingham Steam and Gardens are filtered by vegetation — which tells you mitigation has been actively thought through for the museum, a site connected to why the route changed in the first place. Point 4 says vegetation removed during construction will be reinstated under a couple of cross-referenced management plans. What it does not say is what will actually be planted, where, how dense, or how long it would take to grow — and it says nothing about whether any of this would do anything for the tower nearest the village, RG85. As it stands, this is a generic reference to a plan, not a specific answer to a specific problem. Point 5 says layers of vegetation, including woodland in the valley, filter views. I know this stretch of ground, and that is not what is there. There are no properties in front of or behind this section, and no woodland to filter anything. From the village, this stretch offers no cover at all. Points 6 to 8 all concede visibility without offering anything in return. Point 6 admits the Project will be visible from part of the Angles Way — an ancient route above the valley that is well used by walkers — but proposes nothing to address it. I have looked at the Holford Rules and they do not contain a specific rule about named footpaths or trails; the closest is Rule 2, which requires high-amenity areas to be avoided by deviation. No deviation is offered here. Point 7 refers to the Waveney and Little Ouse Recovery project (WaLOR) as though it were relevant mitigation. It is not National Grid's project. It is an existing, independently funded DEFRA scheme, run by Suffolk Wildlife Trust and the Environment Agency, covering over 1,600 hectares between Diss and Thetford, still in its development phase, aimed at river and fen restoration — nothing to do with landscape or visual harm, and nothing National Grid is funding or delivering. Point 8 concedes visibility from parts of Wortham Ling, a nationally protected SSSI, again without proposing anything specific. Point 9 claims the pylons are sited to minimise effects on Roydon Fen, Wortham Ling and St Remigius Church “in accordance with Holford rules 2, 4 and 5.” I deal with that claim properly below, because I don't think it stands up. Point 10 is worth quoting in full, because that is all it says: “Grade I Listed church of St Remigius.” That's it. Every other point on this plan has a sentence describing the effect and what, if anything, is proposed. Point 10 doesn't. Having checked National Grid's own reference map, pylons RG85, RG86 and RG87 sit directly in view of the church — both looking from the valley toward the church, and looking from the church out across the valley. National Grid offers nothing here to protect either view, even though this is exactly the harm Historic England raised at the hearing. By contrast, National Grid's own wider Environmental Statement gives Bressingham Steam Museum a dedicated numbered viewpoint, Viewpoint 1.19, with its own photomontage (Figure 7.12.F19). Appendix A itself gives Bressingham Steam and Gardens a full sentence at Point 3. St Remigius Church, the higher-graded heritage asset of the two, gets a bare label. Point 11 says views from within Roydon are “largely filtered and screened by existing buildings and vegetation.” That does not sit alongside Points 1, 5 and 9, which all concede open, unscreened views, and it does not sit alongside what nearly the whole village told us in our own survey.

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	The Draft Opportunities Plan I have looked at the accompanying opportunities plan against what is actually at stake here — the heritage, the protected sites, the amenities — and there is very little in it for Roydon. The stretch from roughly RG81 down to RG75, across open, flat fields, matches exactly what Point 1 already admits: no screening. And there is nothing marked as an opportunity anywhere along that stretch. Equally, nothing at all is shown along the back of Baynard’s Green and Snow Street, which is where the impact on the historic core of the village is felt most. Where opportunities are shown, several sit in the middle of fields that are actively farmed — marked as “links to Local Nature Recovery Strategy areas” or “connective green infrastructure enhancements.” National Grid’s own document says, at paragraph 2.6.1, that no discussions have yet been held with the relevant landowners. So there is no reason to think any farmer has agreed to any of this. It’s a drawing on a map, not an arrangement with anyone who owns the land. Nor does the plan deal with the change of direction in the route east of Wortham Ling. This has been reported as a 90-degree turn as the alignment comes down from the area of Doits Lane into the Waveney Valley floor — National Grid’s own Route Drive Site Visit Guidance Document confirms the alignment crosses ‘The Doit’ at this point. A turn like that needs an angle tower — exactly the kind of more massive structure Holford Rule 3 says a route should avoid by staying as direct as possible. National Grid’s plan says nothing about this. Suffolk County Council has raised the same principle elsewhere on this route, at Gislingham, where the alignment changes direction four times and crosses Burgate Road twice; the Council’s own representation to this Examination states this “is likely to result in significant adverse effects and disbenefits for the visual amenity along this route, which is used for recreation.” The same reasoning applies here. The plan also marks an area between Roydon Fen and Wortham Ling as an “opportunity to support enhancements proposed by the WaLOR project.” As above, WaLOR is someone else’s project, not National Grid’s. And at this point the River Waveney is close to its source — it rises a short distance to the west at Redgrave and Lopham Fens and forms the boundary of Bressingham and Roydon before it even reaches Diss. I know this stretch of river, and it is a small headwater watercourse here, nothing like the river further downstream. There is only so much a “blue infrastructure enhancement” can do on a stream this size, and National Grid hasn’t said what it would actually pay for or deliver. More to the point, National Grid’s own document admits the whole opportunities plan is draft, illustrative and unfunded, and states plainly that it “would not materially change the ES assessment of landscape and visual effects” even if it were all delivered (paragraph 2.4.1). Most of it sits outside the Order Limits, on land National Grid does not own or control, with no landowner discussions held (paragraph 2.6.1), and delivery would depend entirely on voluntary agreement. On National Grid’s own account, this plan is not secured mitigation, and the Examining Authority should not treat it as protection for Roydon’s heritage, landscape or amenities, because National Grid itself does not claim that it is. Holford and Horlock: applied, or just claimed? Point 9 of National Grid’s constraints plan says the route has been designed “in accordance with Holford rules 2, 4 and 5” to minimise effects on Roydon Fen, Wortham Ling and St Remigius Church. Set against the rules themselves, I don’t think this claim holds up. Holford Rule 2: avoid smaller areas of high amenity value or scientific interest by deviation —including minimising effects on the setting of listed buildings and areas of historic interest, with SSSIs requiring special consideration for their ecology. The route doesn’t avoid Wortham Ling and Roydon Fen. It runs between them, through a narrow gap, and it doesn’t avoid the setting of the church either. Threading a line between two protected sites is not what Rule 2 means by avoidance. Holford Rule 4: choose tree and hill backgrounds over sky backgrounds wherever possible. National Grid’s own Point 1 admits there is barely any vegetation to provide a background at all on this stretch. The rule’s central requirement is conceded as unmet in National Grid’s own document. Holford Rule 5: prefer moderately open valleys with woods, where towers appear lower and views are broken up by trees. This stretch does not meet that description. The towers here are National Grid’s own standard height for this project — 50 metres, spaced roughly 350 metres apart. From Snow Street through to Darrow Lane the land is flat, open arable farmland, with no woodland and no landform to break up a structure of that height, and nothing beyond hedgerow-scale trees — oaks and field maples, nowhere near 50 metres — anywhere near it. Approaching the village around RG83 to RG74, the towers are visible from open ground in every direction, with nothing to screen them. The Diss & District Neighbourhood Plan’s own Key View 28 describes this same stretch, Darrow Lane, as “one of the few open, agricultural, big sky landscapes in Roydon” — the same absence of cover Rule 5 is meant to guard against. I want to be fair to National Grid on one point: this section of the route carries no statutory landscape designation — no National Landscape or AONB status of the kind that applies to the Dedham Vale, where National Grid has agreed to underground part of the line. That is a real difference, and I don’t think it should be overstated. But it cuts the other way too. Because there is no additional statutory protection here, Holford Rule 5 and National Grid’s own routeing judgement are the only real check on where towers of this height and spacing are placed across open countryside like this. On that test, and on the evidence of National Grid’s own constraints plan, this stretch does not pass it. There’s also Horlock Guideline 2, which governs where sealing end compounds go and would have applied to the Waveney Valley Alternative, since undergrounding needs extra compounds. It requires such infrastructure to avoid SSSIs “as far as reasonably practicable.” National Grid has never shown that this was properly weighed before the Waveney Valley Alternative was dropped. But the real problem goes deeper than any one rule. If Holford Rules 2, 4 and 5 had genuinely been applied to avoid and minimise harm here, there would have been no residual effect left for Action Point 27 to deal with in the first place. The Examining Authority raised Action Point 27 precisely because a residual effect was judged significant enough to need an agreed compensation position. National Grid cannot have it both ways — claiming the route already minimises harm through Holford-compliant design, while a year later still owing the Examining Authority a compensation position for harm that, on that account, shouldn’t really exist. National Grid hasn’t resolved that contradiction, and the evidence above, much of it in National Grid’s own words, points to only one of those two positions being true. None of this is the route National Grid originally preferred in 2022. It is a second-choice alignment, and the one option that would genuinely have relieved the harm at source for Roydon — undergrounding through the valley, the third option on the table — was offered, discussed with residents, and then dropped without the underlying cost and ground-condition evidence ever being published. Measured against its own stated aims of avoiding and minimising harm, this proposal has not met them for Roydon. What the Examining Authority is being asked to decide. Having gone through National Grid’s response to Action Point 27 in full, I do not think the Examining Authority can safely conclude that the current route through Roydon is the least harmful option available, or

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	that the harm to Roydon has been reduced as far as reasonably possible. National Grid's own submission confirms there is still no agreed compensation position, no secured mitigation, and no landowner agreement for most of what appears on the opportunities plan. What has been submitted is not a deliverable package. It is a set of drawings showing what might be possible if third parties agree at some future date, and none of that is currently secured. I also do not think National Grid has shown that the Roydon alignment reflects proper application of the Holford Rules, for the reasons set out above. This brings me back to the Waveney Valley Alternative, which I believe remains central to the case for Roydon. National Grid asks the Examining Authority to accept that undergrounding was considered and rejected, on the grounds of cost and ground conditions. I have not seen, within the examination, a clear comparative assessment showing: • the full engineering basis for rejecting undergrounding; • the detailed cost difference between the overhead route and undergrounding; • how heritage harm to St Remigius Church was weighted against that cost; • how landscape harm to Roydon was weighted; • why avoiding this level of harm to Roydon was ultimately judged not to be worth it. This is not only a Roydon concern. At an Examination hearing, Babergh District Council's leader called for a delay to the project so that further options, including fuller undergrounding, could properly be considered and costed, citing serious concerns about the impact on the environment, communities and businesses. That is the same evidence gap I am raising here, made independently by a local authority. The harm to Roydon does not appear unavoidable. It is the result of National Grid rejecting the one option that would have materially reduced it — undergrounding through the Waveney Valley — without, on the evidence currently before the examination, showing clearly why that option became unacceptable. If cost was the deciding factor, that should be stated plainly and tested openly, rather than assumed to outweigh harm to a village, its heritage and its protected landscape. National Grid's own Action Point 27 response accepts that significant residual harm remains at Roydon. The question for the Examining Authority is not whether that harm exists, but whether it was unavoidable. On the evidence currently before the examination, I do not believe National Grid has shown that it was. I would ask that the Waveney Valley Alternative not be treated as a closed matter, and that undergrounding, or further route refinement away from Roydon, remain live options for proper consideration. Conclusion Roydon Fen, Wortham Ling and Darrow Lane are not background scenery to be filtered by a hedge, which is how National Grid's constraints plan treats them. They are protected sites and rights of way that are part of daily life here — walked, cycled and used by nearly everyone who answered our survey, and deliberately linked, in the village's own Neighbourhood Plan work, into one corridor running through Roydon Fen, Quaker Wood, Brewers Green, Baynard's Green and Wortham Ling. I should be precise here, as something I know as a resident rather than something drawn from any document: Roydon is really two parts. The newer part of the village, along the A1066, has street lighting, pavements, the school, the village hall and most of the recent housing. But the part of the village this response is about — the historic core around Snow Street and Baynard's Green, where Darrow Lane runs — has none of that. There is no street lighting and no made-up footpaths through this part of the village. If you want to walk, run or cycle safely here, you use the quiet lanes and the open spaces this part of the village actually has — Darrow Lane, Darrow Wood Lane, Roydon Fen, Wortham Ling. There isn't a better-lit, paved alternative sitting behind them. For this historic heart of the village, they are the amenity, not an optional extra alongside one. I offer that as my own evidence, to sit alongside the survey figures above showing 98–99% of respondents use and value these three places, and alongside the National Planning Policy Framework's own recognition that access to open space like this is a matter of health and wellbeing for the whole community. This is also the part of the village the route actually crosses. The historic core — timber-framed houses dating from the 17th century, some earlier — sits directly under the alignment, not somewhere alongside it. National Grid has not published exact distances from individual pylons to the listed buildings and homes closest to them, and I think the Examining Authority is entitled to ask for that. I would also ask what is proposed during construction — haul roads, plant, and site access — this close to 17th-century timber- framed buildings, given National Grid's own Outline Code of Construction Practice and Outline Construction Traffic Management Plan (cited above) do not appear to set out anything specific to this part of the village. Nothing in National Grid's Appendix A or its opportunities plan answers this. By National Grid's own account, the opportunities plan is illustrative, unfunded, doesn't cover the Darrow Lane approach where the pylons are most exposed, and wouldn't materially change the assessed landscape and visual effects even if every measure on it were delivered in full. There is no measure in National Grid's response that would actually reduce the impact of this Project on Darrow Lane, Roydon Fen or Wortham Ling — or on the pattern of everyday life in this village that depends on them. The Diss & District Neighbourhood Plan, adopted 16 October 2023 and now part of the statutory Development Plan, protects the two Key Views under this section of the route: View 27, across Snow Street's historic core, and View 28, which describes Darrow Lane as “one of the few open, agricultural, big sky landscapes in Roydon.” These are not casual descriptions. They are the community's own assessment, examined and adopted, of what makes this landscape worth protecting — reached years before this route was ever fixed. , I would ask the Examining Authority to conclude that National Grid's response to Action Point 27, as far as it concerns Roydon and the Waveney Valley, does not provide the agreed position on compensation the Examining Authority asked for; does not show that Holford Rules 2, 4 and 5 have genuinely been applied to avoid and minimise harm to Roydon; and has not shown a single measure that would actually reduce the impact of this Project on Roydon's heritage, its protected landscapes, or the everyday village life — the footpaths, the fen, the common land — that a village without the infrastructure of a town depends on.
Suffolk County Council [REP6-167]	SCC provided its latest response regarding the necessity of the Landscape Compensatory Measures in answer to ExQ2 GEN2.2 [REP5-271] and during Issue-Specific Hearing 4, as detailed in the Post-Hearing Submission submitted at this deadline.

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	SCC and BMSDC engaged with the Applicant on 21 May 2026, with further subsequent engagements. The Council considers that the draft constraints and opportunities plans are a positive starting basis on which matters of detail and local knowledge can be further discussed and incorporated. With particular reference to the Waveney Valley, SCC expressed an interest in public rights of way and accessibility improvements and other measures to address visual amenity.
Suffolk County Council [REP6-166]	5.1.b Masterplans [REP5-199] (and reference to specific areas covered by the masterplans)The most important issue is the substantive measures themselves, with the mechanism(s) for their delivery being a secondary matter. SCC agrees that the dialogue has been constructive and appreciates the works that the Applicant has put into producing the masterplans with input from the Local Authorities. SCC welcomes the provided draft Constraints Plans and draft Opportunities Plans as a starting point for further discussions. SCC considers that the enhancement schemes are a justifiable and proportionate response (as further explained with SCC's answer to ExQ2 GEN 2.2 [REP5-271]) to the widespread residual long-term significant landscape and visual effects, including, but not limited to, the sensitive areas for which these plans have now been prepared. SCC welcomes that the Suffolk LNRS provides the backbone for the proposals. SCC considers that the options that they present do offer a reasonable suite of measures and those opportunities could provide proportionate offsetting for the residual impacts. As to how these measures are best delivered, there is ongoing dialogue in relation to using the vehicle of a Section 106 agreement that has some merit in terms of allowing for flexibility in due course for what may or may not be the measures that are provided – SCC does not rule out this mechanism at the stage. It could also be done in terms of a requirement, calling for a scheme to be submitted and approved but that might have a degree less flexibility. It may need to specify more parameters of what can or cannot be the subject of those subsequent measures. It may be that the way that it is currently being suggested is the best way. SCC does not exclude this mechanism either. SCC queried whether, whilst not wishing to intrude on the ExA's thinking, the ExA is minded to provide clarity on their approach to whether these measures are necessary. This would be beneficial to crystallise this matter for the parties. If there were to be a very clear expectation from the ExA that (having heard all these arguments), for the reasons outlined, there ought to be an offsetting or compensation package then, all parties would know that this is a matter that must be delivered within the remainder of the examination. Regardless, the Council is keen to carry on working with the Applicant to resolve and define the relevant measures clearly and to secure them in a deliverable mechanism. The Applicant identified the options available, all parties are aware of the time limits and all parties will be working to come up with a practical mechanism by the close of the examination. SCC would wish to emphasise that the fact that a measure amounts to an enhancement does not mean that it cannot be compensation of offsetting, rather enhancement can be one type of compensating and offsetting for an impact that you cannot directly mitigate, reduce or avoid. SCC is very content to continue the dialogue with the Applicant to work up more meaningful constraints and opportunities plans so that they are a series of deliverable measures that can therefore be incorporated in one way or another into the controls of the DCO. <i>Waveney Valley</i> SCC considers that the constraints plan accurately demonstrates how sensitive this area is, where the alignment proposes to cross the Waveney Valley. SCC welcomes that the opportunities plan envisages to support enhancement works proposed by the WALOR Project. In this location, to compensate for the effects of the proposed development, the Council considers that a focus of opportunities on landscape and nature conservation would enhance the geography and that substantive consideration of public rights of way and accessibility improvements would enhance the visual amenity and appeal of the area for the local community. <i>Gipping Valley</i> SCC retains its position that the alignment would have been less harmful further west (rather than in the more intact landscape the scheme proposes to traverse) and that the undergrounding of other powerlines should have gone further around Stowmarket. SCC considers that the alignment is too close to Grade II* Listed Creting Hall. Bearing this in mind, SCC welcomes opportunities identified for watercourses and riparian enhancement along the River Gipping and for better connected green infrastructure north-west of Needham Market. <i>Burstall and Bramford</i> SCC and BMSDC, on 1 July 2026, invited the relevant Town and Parish Councils to a meeting to discuss these constraints opportunities plans. Burstall Parish Council expressed that it would seek to submit an alternative opportunities plan, to include local knowledge and landowner deliverability into the proposals, which SCC supports in principle. SCC has long called for a strategic landscape masterplan that is proportionate to the strategic electricity network hub in this location. SCC does not accept the argument that Environmental Areas cannot be delivered due to other projects in the locale. SCC considers that this is exactly what a masterplan should and could address. SCC therefore welcomes the opportunities plan on which further engagement can be based.

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Joanne Elliott and Richard Davies [REP6-209]	Masterplans were set out by National Grid and covered as Agenda Item 5.1. The area where I have detailed knowledge is covered by Appendix E Action Point 27 – Colne Valley. The map for Action Point 27: Colne Valley (north) Draft Opportunities Plan covers the route from the sealing end compound at Crabtree lane across the plateau in front of Fordham Place to south of Fordham Village. Most of this area is already managed by the Woodland Trust and farmers through field margins for diversity and wildlife. NG are proposing a hedgerow along Fordham Lane crossing in front of Fordham Place. Given the size of the infrastructure and open setting, this would only have any screening effect for anyone standing immediately behind and very close to it. The plateau in front of Fordham Place is approached from either side through narrow lanes with high hedgerows, as the hedgerows end, the road turns and the line of sight opens out. It offers views of the meadows and woodlands along the side of the stream in each direction with far-reaching open views. It is stunning and changes in each season. After over 23 years of following this route every day from either direction, it still takes my breath away and delights me. Every Single Time. Planting hedgerows through this area would do nothing to mitigate the impact of the huge industrial structures and would damage what is so breathtaking about the view of the valley in the first place. This would significantly harm this valuable and sensitive landscape. The impact of 50m pylons in this landscape cannot be mitigated. They should not be there at all. “Opportunities for connective green infrastructure enhancements” seem to run along existing farm tracks and footpaths – these mostly already have grass and wildflower margins, it is difficult to see that any real enhancement is possible.
Maxine Suter [REP6-217]	Submission ID: S456E54D1 Planning Inspectorate Reference EN020027 – Norwich to Tilbury Interested Party Reference: [Submission for Deadline 6 – 2359 hrs 7 July 2026 Response to National Grid's Document 8.4.12.2, Response to ISH2 Action Point 27 – Masterplans, Appendix A Waveney Valley (including Snow Street, Roydon, Roydon Fen and Wortham Ling) I am writing as a resident of Roydon. I manned the stalls we ran at Roydon Village Hall and on Darrow Lane for our own community survey on the Waveney Valley Alternative — full day shifts, talking to whoever came through. Nearly the whole village told us they use and value Darrow Lane, Roydon Fen and Wortham Ling, and the overwhelming majority wanted this section undergrounded. National Grid's Appendix A doesn't reflect any of that. **What's actually at stake** This route changes direction as it crosses the village. [RESIDENT'S OWN KNOWLEDGE, NOT FROM A NATIONAL GRID DOCUMENT: it turns at RG81, RG82 and RG83 run behind Roydon parallel with Darrow Lane, RG84 sits at the edge of the village on the A1066, then it turns again to cut across the valley to RG92, with RG88 towering directly between Roydon Fen and Wortham Ling.] That's at least three direction changes through one small village, on ground National Grid's own plan admits has almost no cover. Along that route sits St Remigius Church (Grade I listed), a cluster of Grade II buildings on Snow Street, and The Gables on Darrow Lane, a 17th-century timber-framed house. South of the village, Roydon Fen LNR and Wortham Ling SSSI sit either side of the Angles Way. None of this is background scenery — it's what this part of the village has instead of street lighting or pavements, walked every day. None of it appears as a cost anywhere in National Grid's response: not the loss to home and business values along the route, not the noise, dust and haul-road disruption of construction next to centuries-old buildings, for a village with no bypass and nowhere else to go while it's built. **The Opportunities Plan is not mitigation** National Grid's own document admits the draft opportunities plan, even delivered in full, "would not materially change the ES assessment of landscape and visual effects" (para 2.4.1), and that no landowner has even been approached about any of it (para 2.6.1). Tree planting and support for the WaLOR wetland project do nothing to hide a 50-metre pylon. This is a sketch of things that might happen on land National Grid doesn't own, not a plan. **The Waveney Valley Alternative was dropped before it was properly tested** National Grid withdrew its own 2 km undergrounding offer, citing ground conditions and cost. I don't accept ground conditions were ever the real barrier — National Grid is currently boring tunnels under central London and under the Thames itself at Tilbury, the very endpoint of this project. A company doing that has the technology for a Norfolk field. This was a cost decision. But I don't think a number is the point. No cost should be allowed to outweigh the emotional and mental toll on the people who live with this permanently. This is a national project meant to benefit everyone; it shouldn't be built by loading its whole burden onto one small village because that was cheaper. And even setting cost aside, 2 km was never enough — it would only have moved the pylons to the edge of the village at RG84, still leaving RG82 and RG83 overhead behind Darrow Lane. Anything short of clearing the village fully isn't a solution. **Flat ground, and the Holford Rules** Before this Project, the church tower was the tallest thing on the skyline here. There's no woodland or landform anywhere along this stretch to break up a 50-metre structure — exactly the "open, agricultural, big sky landscape" the village's own Neighbourhood Plan describes at Key View 28. National Grid claims the route follows Holford Rules 2, 4 and 5. Looking at the ground, that doesn't stand up. **What I'm asking the Examining Authority to do**- Treat Action Point 27 as still unresolved for Roydon — National Grid's own document (para 2.8.4) admits no agreed position has been reached.- Stop accepting "ground conditions" as an excuse. Weigh the emotional and mental cost to this village against whatever this project costs to do properly — it never has been.- Keep undergrounding on the table, but only if it clears the whole village, not just to RG84.- Keep re-routing on the table — nothing is fixed until the Secretary of State decides, and this is already the third proposal for this stretch.- Do not accept what is currently on offer. It is not a fair trade for what this village has built and looked after for generations. Roydon, Norfolk
Villages Against Pylons [REP6-172]	Opportunities for mitigation During ISH4, National Grid set out their "Opportunities for Mitigation" in a document titled “Document 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans" which set out proposals for the Colne Valley in Appendix E. In respect of the Colne Valley, they proposed three elements: (i) planting a hedgerow along the road that crosses the valley to the north-east of Fordham, presumably to screen pylons TB36-TB50 from view within the Colne Valley; (ii) small plantations of woodland near TB50, close to the valley floor; and (iii) the introduction of "connective corridors", without specifying what these would be. These proposals illustrate only National Grid's profound lack of understanding of the Valley and the existing conservation work in the area.

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	First, screening the Valley from view would not reduce harm to, nor mitigate the impact of, pylons within it. Rather, it would curtail views across what is an open landscape and prevent people from experiencing its natural beauty – a harm, not a benefit. It may also endanger road users: the road in question is a narrow single-track road with few passing places, several sharp bends and deep ditches, and a hedgerow as proposed would render oncoming traffic invisible to drivers. At the same time, the hedgerows would do nothing to mitigate views of the Valley from the Essex Way or from Hill House Woods. Second, the Valley is already highly connected in ecological terms. Introducing new "corridors" risks disrupting the existing ones and damaging long-established habitat connectivity. The Woodland Trust's Fordham Hall Estate – at over 500 acres, the largest woodland creation site in eastern England – already encompasses a carefully planned mix of grassland, broadleaved woodland and wetland habitats. 120 hectares (300 acres) of new native woodland and 60 hectares (150 acres) of grassland have already been planted, with 19km (12 miles) of unsurfaced paths providing public access. The site is deliberately managed to support diverse wildlife, including otters and water voles, and contains two groups of ancient cricket bat willows thought to be around 200 years old (see: https://www.woodlandtrust.org.uk/visiting-woods/woods/fordham-hall-estate/). To propose unspecified "connective corridors" in an area already subject to such meticulous habitat planning demonstrates a disregard for the work already undertaken by conservation bodies and risks disrupting the existing connectivity that has been so carefully established. Third, the proposed woodland site near TB50 sits at a natural flood point on the River Colne. Planting there is likely either to fail, or to have unforeseen and potentially serious consequences for the river and its course over a long stretch. National Grid appears to be entirely unaware that a major natural flood management project has recently been completed in this very location. The Fiddlers Hill wetland scheme, a three-year collaboration between the Essex & Suffolk Rivers Trust, the Woodland Trust, the Environment Agency, Essex Wildlife Trust and Essex County Council, was completed in November 2025 (see: https://www.bbc.co.uk/news/articles/czj0dwjrdj4o and https://www.essexsuffolkriverstrust.org/fiddlers-hill). Large, shallow ponds known as "scrapes" have been dug across five hectares of floodplain grazing meadow on the River Colne, specifically designed to increase the meadow's capacity to hold water during heavy rainfall and reduce flood risk locally, including to the road on nearby Fiddlers Hill. The project involved excavating ponds, expanding fen areas, creating shallow channels, and lowering riverbanks to encourage seasonal flooding. It is the first project completed under the East Anglia Natural Flood Management Local Levy funding and is intended to demonstrate how nature-based solutions can protect communities from flooding while enhancing the environment. To propose woodland planting on a site that has just been transformed into a carefully engineered wetland habitat, designed specifically to hold water during flood events, reveals either a startling ignorance of the existing landscape or a wilful disregard for the considerable public investment made in this conservation project. Finally, the sites described above have been developed thoughtfully, with the support and involvement of the local community, and are a greatly valued asset. Fordham Hall Estate is open to the public with a free car park, and the Essex Way long-distance footpath runs through the estate, providing a popular route for walkers (see: https://en.wikipedia.org/wiki/Essex_Way). Fordham parish itself has an extensive network of public rights of way, with some 44 public footpaths recorded (see: https://osm.mathmos.net/prow/progress/essex/colchester/fordham/), demonstrating the area's high value for public amenity and recreational walking. The site has also revealed archaeological interest, with fieldwalking evaluations identifying potential prehistoric occupation areas and Roman brick and tile. A popular 3.9-mile circular walk through the estate is well-documented (see: https://www.greatbritishlife.co.uk/magazines/essex/22565560.tried-pretty-countryside-walk-fordham-near-colchester/). National Grid could scarcely have chosen a less suitable location for these proposals, nor a less well considered manner of proposing them - as an afterthought and with no community involvement. These proposals should be seen for what they are: an improvised response to a question for which National Grid had no prepared answer, put forward in order to be seen to be doing something. They are not the "something" that is required - they are unhelpful at best and actively harmful at worst, have not been consulted on, and carry no support from the local community, or from Parish, City Councils, or the multiple conservation bodies who have invested years of work in this landscape. They must also be explicitly rejected.
The Langleys Estate [REP6-169]	National Grid submitted Document 8.4.12.2, Response to ISH2 Action Point 27 – Masterplans (Planning Inspectorate Reference EN020027), in June 2026. Despite being a recent submission, the document contains significant inaccuracies.

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	We have been informed directly by National Grid that the pylon route between TB137 and TB143 has been altered. However, this document continues to show low-height pylons to the south of the River Chelmer. At this advanced stage of the Examination, it is entirely reasonable for affected landowners to expect accurate plans. The continued publication of incorrect mapping makes it extremely difficult to understand the proposals affecting our land and undermines confidence in the information being provided. In Appendix F (page 28), Action Point 27: Great and Little Waltham – Draft Opportunities Plan, National Grid identifies "opportunities for enhancements along watercourses". One of the proposed areas lies within woodland, while the other two are existing Cricket Bat Willow plantations. National Grid has been informed on several occasions that these willows are a valuable commercial crop forming part of the Estate's farming business, yet this appears to have been disregarded. The document also proposes planting trees and hedgerows across an active agricultural field. Such planting would divide the field into smaller parcels, making efficient commercial farming impractical. A further proposed planting opportunity is along Chatham Hall Lane, even though, with the exception of approximately 60 metres, the lane is already bordered by mature trees and hedgerows. These examples demonstrate that the document is based on an inadequate understanding of the land it seeks to “enhance”. National Grid itself acknowledges that: "No discussions have yet been held with the relevant landowners and no agreement has been reached to pursue compensation or enhancement measures between the Applicant and other parties." This admission prompts an obvious question: why were landowners not consulted before these proposals were prepared and submitted? Meaningful engagement with those who know and manage the land would have avoided many of these inaccuracies and resulted in far more realistic and credible proposals, eg on the same plan there are three fields of permanent pasture where hedgerows would have been a beneficial suggestion. These fields can easily be seen on Google Maps, as can the hedgerows and trees down Chatham Hall Lane and the wood. This document was written to answer Action Point 27 from the EA, but in my view for Great and Little Waltham it fails to do so on many points.
Villages Against Pylons [REP6-172]	The Applicant's Draft Colne Valley Constraints and Opportunities Plans have been reviewed as part of this submission. Whilst the principle of landscape enhancement is supported, it is considered that the proposed opportunities for the Colne Valley would make only a limited contribution towards addressing the significant landscape and visual effects identified within the Applicant's own Environmental Statement. The principal adverse effects of the proposed overhead alignment arise from the introduction of pylons into a highly sensitive river valley landscape, resulting in skyline intrusion, changes to landscape character, and widespread visual effects experienced across the valley by residents, users of the PRow network and road users. These effects occur at the scale of the landscape itself. By comparison, the Opportunities Plans rely predominantly upon hedgerow planting, hedgerow enhancements and habitat connectivity measures. Whilst such measures may deliver ecological benefits, they would not materially compensate for the fundamental changes to landscape character or reduce the extensive visual impact of the proposed pylon corridor. In addition, some of the proposed opportunities appear to prioritise screening of the development rather than conservation of the existing landscape character. For example, the Draft Opportunities Plan for the northern part of the Colne Valley identifies opportunities to close views of the Project from receptors on the elevated plateau around Fordham through additional hedgerow planting. Whilst reducing localised views of the proposed infrastructure may have visual benefits, this approach does not reflect the characteristics of the landscape. One of the principal qualities of the elevated land around Fordham is the opportunity to experience expansive panoramic views across the Colne Valley towards its wooded valley sides and rolling landform. These open views are a fundamental component of the area's scenic quality, perceptual experience and appreciation of the wider valley landscape. They contribute directly to the landscape's value and to the way in which the Colne Valley is experienced. Accordingly, whilst the draft Opportunities Plans demonstrate that some local environmental enhancement may be possible, they are not regarded as providing meaningful compensation for the significant landscape and visual effects identified by the Applicant's own assessment. Nor do they alter the conclusion that the proposed overhead alignment would result in substantial and long-term changes to the character and visual experience of the Colne Valley.

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