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Norwich to Tilbury

Volume 8: Examination Documents

Document: 8.4.10 Applicant's Comments on Responses to ExQ1 - Clean Version

Final Issue B

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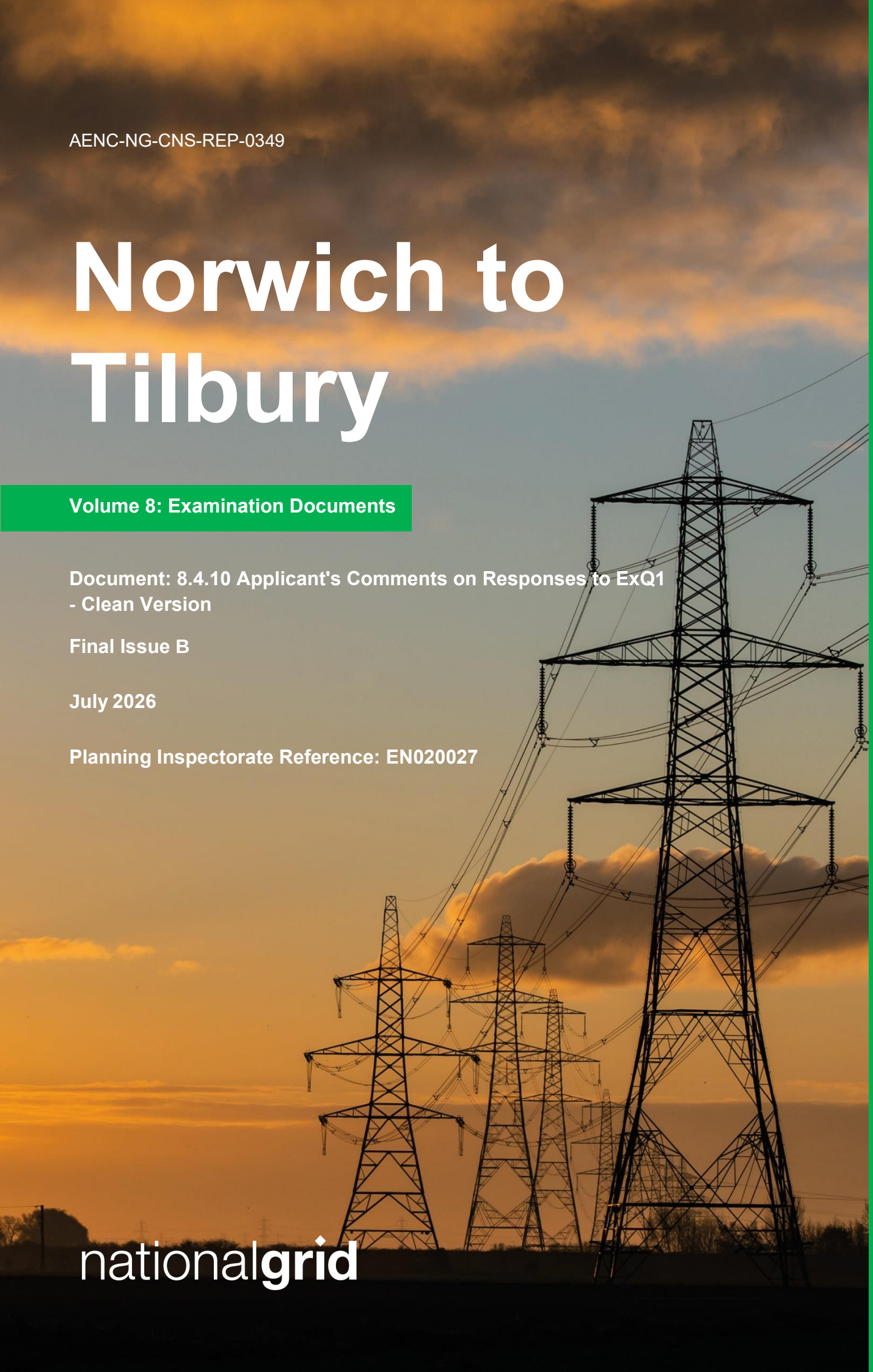

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1. Introduction

1.1 Purpose of the Document

1.1.1 This document provides the Applicant's comments on responses provided by Interested Parties (IPs) and Affected Parties (APs) to the Examining Authority's first written questions (ExQ1) **[PD-014]**. Responses were submitted at Deadline 3, 10 April 2026 and published on 15 April 2026.

1.1.2 The Applicant has reviewed the responses to questions directed to other parties (or jointly to other parties and the Applicant) and provides comments where clarification, correction, or further context is necessary or helpful. The Applicant highlights that in some cases written questions directed solely to the Applicant have been responded to by other Interested Parties (IPs) and Affected Persons (APs); the Applicant has also responded to these in lined with the approach described above. Where the Applicant has no comment, the IP response has not been included.

1.2 Document structure and content

1.2.1 This document is structured into the ExQ1 topics, with one table per topic. Where the Applicant's comments relate to more than IP response, the column is merged and the comments are not repeated.

1.2.2 The Applicant has responded to the submissions from Pylons East Anglia (PEA) [REP3-131 to REP3-138] separately in **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1**. This is because PEA submitted a number of detailed appendices with their responses to ExQ1, which form the majority of their submission, and to which the Applicant has also responded. Given the length of that submission and the Applicant's response, a separate document was considered most appropriate.

1.2.3 The Applicant has identified a small number of IP submissions that provide commentary on ExQ1 that appear directed to the Examining Authority (ExA) and make requests for questions to be posed to the Applicant. These are REP3-148, REP3-149, REP3-174. The Applicant willrespond as appropriate to any future questions or requests from the ExA once issued to the Applicant.

1.2.4 The Applicant has also identified two submissions that are labelled in the Examination Library as responses to ExQ1 but have not been included in this document: REP3-128 (Norfolk Gliding Club) is a duplicate of REP2-126, which is a general submission and is not a response to ExQ1. REP3-139 (ScottishPower Renewables (UK) Limited and East Anglia THREE Limited) is identified in the Examination Library as a response to ExQ1, however, the document does not identify a specific Written Question that it is a response to nor does it reference ExQ1. Therefore, to avoid incorrectly assigning this document to an incorrect question, the Applicant has instead treated this submission as a general representation. Both REP3-128 and REP3-139 are therefore considered in detailin **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3**.

2. General and cross-topic questions

Table 2.1 General and cross-topic questions

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
GEN 1.1	The applicant All interested parties	**Responses to submissions by Interested Parties** It is essential for the successful delivery of the timetable of the examination that all parties are able to easily interpret the applicant's responses to comments made by interested parties (IPs) in their submissions both in writing and orally. The ExA issued a Rule 17 letter on 3 March [PD-012] and responded to the applicant's response to that letter on 6 March [PD-013]. The letters set out the ExA's concerns relating to the lack of detail in the applicants response to relevant representations (RRs) **[REP1-132]**, and there were similar issues with the applicants response to submissions to the open floor hearings (OFH) **[REP1-140]**. The ExA accepts that a number of issues are common to a large number of IPs. Nonetheless, those responses which include specific locational detail (for example to a certain natural environment designation, landscape feature, heritage asset, affected business and so on) which is not common to other submissions should be specifically responded and not grouped with the issues which arise from the project as a whole. Submissions by all statutory consultees should also be responded to in appropriate detail. Statutory consultees include parish councils. Responses should not only refer to the relevant section of the Environmental Statement (ES) or other application document, but should also provide a brief summary so that the applicants response can be easily interpreted by all parties. The ExA expects this approach to be taken throughout the examination. In doing so, the applicant and other parties are advised to title issues as they are listed in the initial assessment of principal issues (IAPI) as set out in annex C of the Rule 6 letter [PD-009], and other issues as titled in the categories within these written questions.	**Ardleigh Parish Council and Little Bromley Parish Council** The Parish Councils consider that the information and responses provided by the Applicant does not enable a proper understanding of the Proposed Development or its effects. First, a meaningful cumulative assessment is not presently achievable, in particular because the location, design and size of the proposed Tarchon interconnector and substation remain unknown, with (as the Parish Councils understand) no application for that development anticipated until at least 2028; Secondly, even within the material provided, the Applicant continues to present information in a fragmented and thematic manner. Responses remain grouped thematically, cross-refer to documents rather than explain impacts and treat projects as separate entities rather than a combined scheme. That remains the case in Document 8.4.1 (Rev B).	As stated in **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**, in the Applicant's response to Suffolk County Council (page 96), the Applicant is aware of the Tarchon Interconnector Project. The Tarchon Interconnector Project has been included in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4, is considered in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and also in **8.3.62 Draft Statement of Common Ground – Tarchon [Revision B]**. The Applicant has acknowledged feedback from the Examining Authority and Interested Parties on the approach to written responses, as provided in the Rule 17 Letter **[PD-012]** and through written question GEN1.1. As stated in the Applicant's response to GEN1.1 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant has set out its adoption of an approach to written responses which reflects and addresses the feedback received. Furthermore, the Applicant submitted **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]** on 17 April 2026 which provides individual detailed responses to Relevant Representations submitted by statutory consultees, including parish and town councils. This addendum includes individual response tables for Ardleigh Parish Council (Table 2.3) and Little Bromley Parish Council (Table 2.37), which provide the Applicant's detailed responses to the parish councils' Relevant Representations.
			Suffolk County Council SCC welcomes this approach. SCC would highlight that the Applicant has not responded to post-hearing submissions, other than for the Open Floor Hearings. Whilst, in large part, these submissions from Interested Parties are transcripts of the hearing, they may also contain any information which was to be covered in writing. In particular, SCC raised points in its Issue Specific Hearing 1 post hearing	The Applicant provided a response to Suffolk County Council's oral submissions in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]**. The Applicant also provided a response to specific comments from Interested Parties (including Suffolk County Council), and responses to ISH1 Hearing Action Points, in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			submission **[REP1-177]** which the Council believes would benefit from the Applicant's response.	In relation to **[REP1-177]** specifically, the Applicant acknowledges it did not respond to this document in full at Deadline 2. However, the Council does identify in **[REP1-177]** that further detail on the points made is also reflected in its Relevant Representation **[RR-3520]** and its Local Impact Report **[REP1-178]**. The Applicant therefore responded to points made in **[REP1-177]** via both the above documents and in Appendix AB of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and the Suffolk County Council Local Impact Report (**8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. If the Council considers that any points raised in **[REP1-177]** are not sufficiently responded to in the above submissions, and submissions made since, the Applicant will endeavour to provide further clarification as necessary.
GEN 1.3	All local authorities in particular: Norfolk CC Essex CC Colchester CC Tendring DC Basildon BC Thurrock Council Parish councils: Swainsthorpe Newton Flotman Hintlesham and Chattisham Copdock and Washbrook	**National and local planning policy compliance tracker** Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process. The applicant submitted a policy compliance tracker **[REP1-133]** at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies. The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate representation of their newly designated and/ or emerging policies and provide any additional comments relating to the applicant's regard to those policies. All relevant planning authorities are invited to make comment on the content of the compliance tracker. If you have already dealt with changes to policy in your local	**Essex County Council** ECC refers to the relevant district authorities to comment on the content of the compliance tracker where this relates to newly designated and/or emerging policies. The ECC LIR (REP1-161) contains details of relevant county policies and the policy compliance tracker accurately reflects their current status. **Chelmsford City Council** The compliance tracker is inaccurate. The following policies should be stated in full and not abbreviated: • Strategic Policy S1 – Spatial Principles • Strategic Policy S4 - Conserving and enhancing the natural environment • Strategic Policy S9 – Infrastructure requirements • Policy DM6 - New development in the Green Belt • Policy DM14 - Non designated heritage assets • Policy DM18 - Flooding / SUDs A number of policies are missing. These include • Strategic Policy S7 – The spatial strategy • Strategic Policy S8 – Delivering economic growth • Strategic Policy S10 – Securing infrastructure and impact mitigation • Policy DM7 - New buildings and structures in the Green Wedge • Policy DM8 - New buildings and structures in the rural area	The Applicant has reviewed the feedback provided to GEN 1.3 and cross-referenced to the individual Local Impact Reports which also identified relevant planning policies. The Applicant has set out how the Project has had regard to these policies and reported this in the update to **8.4.2 Policy Compliance Tracker [Revision B]** submitted at Deadline 4.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
		impact report (LIR) there is no need to provide a response.	• Policy DM10 - Change of use (Land and buildings) and Engineering operations • Policy DM19 – Renewable and low carbon energy • Policy DM27 - Parking standards CCC's LIR (REP1-153) contains an up-to-date position regarding the status pf adopted and emerging local and national planning policies. **Basildon Council** ECC refers to the relevant district authorities to comment on the content of the compliance tracker where this relates to newly designated and/or emerging policies. The ECC LIR (REP1-161) contains details of relevant county policies and the policy compliance tracker accurately reflects their current status. The Compliance Tracker submitted by the Applicant at Deadline 1 refers to the Regulation 18.3, which is the latest document consulted upon at the time of writing. Since Deadline 1, Basildon has proceeded to develop the Regulation 19 draft of the Local Plan. In this draft, the labels are the same. Aside from general minor text amends, the main relevant text changes for the emerging Local Plan Draft are as below: Following consultation, the revised Regulation 19 text for Policy NE1: Conserving and Enhancing the Natural Environment has additional text including the requirement on urban and brownfield sites for development proposals to apply the Urban Greening Factor (UGF) to quantify and secure high quality greening measures that deliver biodiversity net gain, climate resilience, and health benefits. Proposals are also encouraged to use Natural England's Environmental Benefits from Nature Tool to assess and demonstrate the wider environmental and social benefits of nature-based solutions. It also adds requirement for the delivery of suitable Alternative Natural Greenspace (SANG) **Norfolk County Council** NCC's LIR **[REP1-173]** already refers only to the "new" Norfolk Minerals and Waste Local Plan which has been adopted since May 2025. NCC is satisfied that the applicant has complied with the policies of Norfolk Minerals and Waste Local Plan. **South Norfolk District Council** The Greater Norwich Growth Board updated the GI strategy on 11 March 2025 which includes a Web App GNGI web app.	

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			The Norfolk Local Nature Recovery Strategy was published on 31st October 2025 along with the Norfolk Local Habitat Map. Both documents should be used to inform strategic habitat enhancements and creation (relates to B201 in the oCOCP). **Colchester City Council** As set out at 1.1.11 in REP1-133, Colchester City Council (CCC) are in the process of drafting a new Local Plan which has passed the consultation stage of the preferred options (Regulation 18). CCC has reviewed REP1-133 and in particular pages 384 to 411 which deals with a number of the Reg 18 preferred options policies and signposts the relevant section of the ES that deals with that theme. As set out in CCC's LIR, while the Council may not concur with the overall findings of the level of harm the applicant has noted, the Council considers the correct Reg 18 policies to have been reviewed by the applicant in REP1-113. The key point is one of weighting. Work is currently underway to produce a Regulation 19 plan but that is not at publication stage. It is not at a point where weight can be afforded to it. Therefore, very little to no weight should be afforded to the Regulation 18 policies listed in this section. **Thurrock Council** The Council confirm no new changes to policy. The Council have already addressed the stage the emerging local plan is at within the Local Impact Report. **Braintree District Council** BDC has reviewed the Applicant's compliance tracker in the context of the Adopted Braintree Local Plan (2013 2033) and the emerging Local Plan Review (Regulation 18, 2026). Several of the Adopted Local Plan policies referenced in the Council's Local Impact Report have materially evolved within the Preferred Options draft, particularly in relation to design, Biodiversity Net Gain, green infrastructure, and the spatial strategy. This includes the "Kings Dene" allocation interface, which is discussed in Paragraph 3.2.6 of REP2-033. While the Adopted Plan remains the statutory development plan, the emerging Regulation 18 policies represent a clear direction of travel and are capable of being material considerations. The Council therefore invites the Applicant to update the compliance tracker to reflect that Braintree District Council has progressed the Local Plan Review to Regulation 18 stage (March 2025 consultation). A policy comparison table is appended at	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Annexe A, identifying where there are major changes between the Adopted Local Plan policies and their Regulation 18 counterparts.	
			Suffolk County Council SCC considers that this matter has been covered within the Joint LIR **[REP1-178]**.	
			Tendring District Council TDC has already dealt with changes to policy, including the ongoing work on our emerging Local Plan to 2042 in our local impact report (LIR) (TDC have recently concluded the Regulation 18 consultation on our emerging Local Plan).	
GEN 1.4	All local authorities	**Development plan documents and supplementary planning documents** All local authorities are asked to review the listed development plan documents (DPD) and supplementary planning documents (SPD) (including masterplans) as currently set out in the planning statement [APP-085] (paragraph 2.5.12) and provide any updates, setting out which have been adopted, updated, or are emerging since production of the planning statement.	**Essex County Council** ECC has no updates to the listed development plan documents (DPD) and supplementary planning documents (SPD) (including masterplans) as currently set out in the planning statement [APP-085] (paragraph 2.5.12)	The Applicant notes the feedback received. Relevant development plan documents which have been updated since 1 April 2025 have been captured and reported on in the **8.4.2 Policy Compliance Tracker** submitted at Deadline 1 **[REP1-133]** and updated at Deadline 4 **[Revision B]**.
			Chelmsford City Council The list is up to date and accurate, with the exception of the following documents: • Essex Coast RAMS • Great Baddow VDS • Stock VDS • Danbury Neighbourhood Plan 2024 • South East Inshore Marine Plan • Planning Obligations SPD 2021 Their omittance does not change CCC's comments as set out in its LIR REP1 153.	
			Brentwood Borough Council BBC has reviewed the listed documents and can confirm that they are relevant and up to date.	
			Norfolk County Council As noted in our answer to GEN 1.3, the Norfolk Minerals and Waste Local Plan was adopted in May 2025. As a result the following DPDs are no longer part of the local development framework: • Norfolk County Council, Norfolk Minerals and Waste Development Framework: Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted 2011)	

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			• Norfolk County Council Community and Environmental Services, Norfolk Minerals and Waste Development Framework: Minerals Site Specific Allocations Development Plan Document (adopted 2013, amendments adopted 2017) • Norfolk County Council Environment, Transport and Development Department, Norfolk Minerals and Waste Development Framework: Waste Site Specific Allocations Development Plan Document (adopted 2013) There are no other updates to listed DPD documents for which NCC is responsible. NCC defers to South Norfolk District Council in relation to DPDs and SPDs for which that council is responsible. **South Norfolk District Council** SNDC note that the Newton Flotman Neighbourhood Plan was adopted 27th October 2025 and request that the South Norfolk Landscape Susceptibility in relation to Energy Generation, Storage, and Transmission SPD which was adopted in February 2026 be added to the list of adopted documents. **Braintree District Council** The Council have reviewed the list in Paragraph 2.5.12 relevant to its area and are generally content, subject to the following additions for completeness: • Steeple Bumpstead Neighbourhood Plan – Adopted June 2025 • Earls Colne Neighbourhood Plan – Adopted July 2025 • Braintree Preferred Options Local Plan Regulation 18 Consultation (March 2025) **Colchester City Council** As set out above CCC are in the process of drafting a new Local Plan which has passed preferred options (Regulation 18) stage but is not at a point where weight can be afforded. Work on the Regulation 19 plan is ongoing. CCC would like to note that the Essex and Southend-on-Sea Waste Local Plan (adopted 2017) and the Essex Minerals Local Plan (adopted 2014) cover the CCC area but are Essex County Council plans and are not adopted by CCC. The list on page 42 states that the Tendring Colchester Borders Garden Community DPD is emerging, but it has been adopted.	

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			Great Tey have an adopted Neighbourhood Plan as of October 2024. Great Horkesley is classed as an 'emerging' Neighbourhood Plan and is 'in progress' but is not at a stage where there is a published draft to read. **Thurrock Council** The listed development plan documents include all updated development plan documents. The Council request the following planning document is added: • Thurrock Design Guide – Design Strategy SPD (Adopted 2017). **Babergh and Mid Suffolk District Council** Baylham Neighbourhood Plan and Copdock and Washbrook Neighbourhood Plan are both now fully adopted. **Suffolk County Council** SCC considers that all relevant planning policies produced and published by Suffolk County Council within the Planning Statement [APP-085] to be sufficiently up-to-date. **Tendring District Council** The Tendring Colchester Borders Garden Community Development Plan Document (DPD) is not an emerging document anymore, instead it was adopted on June 9, 2025. The adopted Tendring Colchester Borders Garden Community Development Plan can be viewed at this link	
GEN 1.5	The applicant Norfolk CC Suffolk CC Ipswich BC Colchester CC Thurrock Council	**Local government reorganisation** Local elections are to take place in a number of the host local authorities on 7 May 2026, and many will be undergoing local government reorganisation and/ or devolution. The listed local authorities are asked to set out: a) any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured b) any implications for their role as a discharging authority post-consent, and whether any changes to the draft Development Consent Order (DCO) would be necessary The applicant: explain any changes to its ongoing dialogue with the affected local authorities and how it intends to deal with any changes in the draft DCO.	**Essex County Council** ECC does not expect LGR and any transitional discussions to affect its continuing involvement in the examination process. There is no immediate change to ECC's status in the examination simply because local elections are taking place. However, the outcome of local elections on 7th May is unknown and a change in the political control of the Authority may result in different priorities and have a bearing on the approach of the Council to the examination process. Details regarding post LGR structure and responsibilities especially in relation to ECC as a highway authority have yet to be finalised. ECC however recognises that the wording of the DCO must be such that any requirement, approval, certification, consultation or protective-provisions function intended to be exercised by ECC after 1 April 2028 will be exercisable by the relevant new authority, to which the powers will transfer. While difficult	The Applicant updated the definition of 'relevant planning authority' in **3.1 Draft Development Consent Order [REP3-004]** that was submitted at Deadline 3 to account for a future reorganisation and/or devolution. The Applicant is considering the need to refer to 'successors' (plural) in its definition in **3.1 Draft Development Consent Order** to be submitted at a future deadline.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			to comment on any implications for the future discharging of requirements at this time, ECC believes that the current draft DCO [REP2-005] does not need substantive amendment to address LGR, because it already allocates discharge functions by role and area, not by naming ECC as the discharging body. ECC considers it will be important for the DCO to incorporate appropriate text that is sufficiently flexible to cover post LGR structure. The continued use of discharging authority, relevant planning authority, relevant highway authority would appear to support such an approach and it is respectfully suggested at Article 2(8) that it would be sensible to tweak the drafting of definitions for relevant planning authority / relevant highway authority, to refer to "any successor or successors in function", in case the relevant function is split across more than one successor. It is also suggested that Article 2(8) could be further amended so that it caters expressly for more than one successor authority: "References in this Order to any statutory body include that body's successor or successors in respect of functions which are relevant to this Order and, where there is more than one such successor, the successor authority for the area to which the relevant provision relates."	
			Norfolk County Council NCC's constitutional and delegation arrangements are that our relevant representation [RR-2753] has been approved by councillors. The same decision directed officers to "make further submissions and representations to the examination of the Norwich to Tilbury project as required by the examination timetable and consistent with the position set out in the relevant representation as authorised". Officers are therefore authorised to take a consistent approach throughout the examination, including the pre-election period for the upcoming local elections. This situation will automatically persist after the election, unless a contrary further decision is taken. As regards local government reorganisation, Norfolk County Council and the Norfolk lower-tier authorities will be abolished and replaced with three unitary authorities. This will not happen in time to affect the examination of this project. Shadow authorities will be elected in May 2027 and the new authorities will be operational from April 2028. For post-consent matters, NCC understands that the applicant intends to begin discharging requirements soon after any consent is granted. It is NCC's view therefore that the DCO must be drafted on the basis of the current	

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			local government arrangements but in a way which makes succession of functions as seamless as possible. For example, defining councils by reference to existing statutory roles rather than by name will make it more likely that responsibilities will be transferred automatically as part of transition arrangements.	
			South Norfolk District Council On Wednesday 25th March 2026 it was announced that the preferred option for the unitary authorities in Norfolk was three new Unitary Councils, Greater Norwich, East Norfolk, and West Norfolk. Norwich to Tilbury is currently within the South Norfolk District Council and the Norfolk County Council however upon establishment of the new unitary authorities in 2028, this will be within the 'East Norfolk' authority. SNDC provide this comment solely for additional information and does not prejudice any points raised in Norfolk County Council's response.	
			Colchester City Council CCC has a good working relationship with the other authorities involved in this project and in the event of a merger of the north Essex area we are confident the relevant officer will be able to work together as we currently are. CCC are broadly aligned with both Braintree DC and Tendring DC and are in constant discussion with them. The timetable for this examination means that although the Essex LPAs have received the government 'minded to' letter, the DCO decision will be issued well ahead of vesting day in March 2028 and all LPAs will be discrete local authorities up to that day, even if they are working close together. In terms of the DCO wording, 'relevant local authority/host local authority' should be used, encompassing both upper and lower LPAs and/or new unitary authorities and new strategic mayoral authorities. The current draft DCO [REP2-005] does not need substantive amendment to address LGR. Article 2 defines "relevant planning authority" and "relevant highway authority" by reference to the authority for the relevant area and, as a result of the recent revisions, includes "any successor in function"; Article 2(8) also makes clear that any statutory body referred to in the order includes the body's successor in respond of functions which are relevant to the Order. However, it would be sensible to tweak this drafting to refer to "any successor or successors in function", in case the relevant function is split across more than one successor.	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Thurrock Council The Council make the following responses: a) At this stage, the Council does not anticipate that there will be any disruption to its involvement in the ongoing examination and the Council will continue to engage with the Applicant post elections. While the outcome of the May 2026 elections may involve a new administration the Council will continue to maintain its position as stated in its submitted Relevant Representations and Local Impact Report. b) Should a Development Consent Order be granted, as a host authority, the Council has a duty to discharge requirements. It is expected that any local government re-organisation or devolution will alter the Council's functions or boundaries. Any successor authority would assume the relevant responsibility of discharging the requirements. On that basis, the Council considers that the draft DCO should: Include appropriate provisions to ensure that references to the "Relevant Authority" are to be read as including any successor body; and/or provide sufficient flexibility to enable functions to be exercised by any authority to whom those functions are transferred.	
			Suffolk County Council a) The examination will have concluded before the planned timetable for local government reorganisation takes effect, so SCC does not envisage that process impacting on the examination, or on SCC's ability to participate in it or assure a consistency of approach. SCC does not anticipate any implications for continuing involvement in the examination process as a result of the electoral moratorium prior to 7 May 2026. Following the election, SCC officers will engage with elected members to ensure that they are sufficiently trained and briefed on their portfolios, during this same period the Council would expect that a cabinet will be formed. Whether any existing SCC policies relevant to the subject matter of the examination will be continued, reviewed, or revised after the local elections will be a matter for elected members to determine, and is not a matter SCC can address at the present time. As a result of the secured Planning Performance Agreement ("PPA") and its obligations of performance standards on the Council, SCC anticipates that a consistent approach to responses will be assured (subject to the potential of any revised policy decisions as above).	

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			b) SCC is still processing the implications of the Government's 25 March 2026 decision for Local Government Reorganisation in Suffolk. For clarity, the decision set out that there will be three unitary councils for Suffolk. SCC considers that the statutory role of host authority under the Planning Act 2008 will sit with the relevant unitary authority. Further, however, there are discussions ongoing regarding the disaggregation of services. SCC will continue and intensify engagement with the District and Borough Councils to ensure a smooth establishment of the three unitary authorities in April 2028. Whilst there will be challenges such as agreeing and integrating administrative systems and processes for the discharges of requirements, SCC would expect that these challenges to be resolved without delay to the discharge of requirements. Finally, as the DCO refers to the "relevant discharging authority" and other statutory roles and functions (such as the "relevant planning authority", "highway authority", "traffic authority", or "street authority"), SCC would expect these requirements to transfer to the relevant successor organisation(s). However, SCC can envisage that it is possible that some discharging functions which are currently the responsibility of a single authority (such as SCC as local highway authority) might become a matter for two or more authorities where a highway or street subject to the provisions of the DCO was affected by a new administrative boundary. SCC would therefore ask the Applicant to review whether any amendments are needed to the text of Schedules 3 and 4 of the draft DCO to ensure that the discharging arrangements would still operate effectively if functions were to be split in future between two or more successor bodies.	

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GEN 1.6	All local authorities MOD Natural England Environment Agency Any IPs who wish to make comment	**Critical national priority** The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified. NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the planning statement [APP-085] sets out a summary of the potential residual impacts (non Habitats Regulations Assessment (HRA) impacts) which may remain after the mitigation hierarchy has been applied. These relate to the relevant exceptions listed in the CNP policy at NPS EN-1 paragraph 4.2.15: human health and public safety, defence, irreplaceable habitats, the achievement of Net Zero, and flood risk. Paragraph 4.2.17 of NPS EN-1 sets out that the Secretary of State will also take as a starting point that CNP infrastructure will meet a number of policy tests including in relation to green belt, sites of special scientific interest (SSSI), nationally designated landscapes and heritage assets. IPs are invited to review the applicant's consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making) In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of	**Essex County Council** ECC has reviewed the Applicant's consideration of CNP in the planning statement (APP-085) and would make the following comments on the Applicants approach. The Applicant correctly states the position in paragraph 3.2.5. There, the Applicant does not treat CNP policy as a freestanding additional aspect of the need case, but as a policy lens that applies after the ordinary assessment of need and the application of the mitigation hierarchy to the effects of the project. The Applicant correctly emphasises that, where there are residual non-Habitats Regulations impacts after all possible mitigation has been applied, the urgent need for CNP infrastructure, together with other benefits, will generally support grant of permission because it outweighs those residual impacts (unless exceptions apply). The Applicant rightly does not suggest that the fact that the project is CNP Infrastructure means it is subject to any less stringent obligations to mitigate impacts through the full application of the mitigation hierarchy (see especially paragraphs 7.1.7-7.1.12 on the requirement to apply the mitigation hierarchy). CNP policy applies only to residual, non Habitats Regulations, impacts. Focusing on the Applicant's approach to residual impacts from paragraph 7.2.52 onwards: i. Green Belt: ECC has no specific comments to make in respect of green belt but would defer to district authorities within Essex where there is designated green belt land affected by the proposal. ii. SSSI: ECC agrees that the Applicant's strategic mitigation has resulted in a development route that avoids any predicted impacts on SSSIs. iii. Designated landscapes: ECC defer to the submissions of the National Landscape team in respect of the Dedham Vale National Landscape and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation. iv. Heritage assets: Paragraphs 7.2.56-57 of APP-085 consider Substantial harm to or loss of significance to Heritage Assets. Paragraph 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The harm is considered necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. ECC cannot agree	**Overview on CNP** The Applicant's position on Critical National Priority (CNP) infrastructure is set out in **5.6 Planning Statement [APP-085]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant welcomes the feedback from Essex County Council and Tendring District Council confirming how the Project has correctly interpreted the CNP policy. The Applicant notes that other local authorities consider that the reference to CNP policy is premature on the basis of impacts being insufficiently assessed, unresolved or subject to outline mitigation. 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: Paragraph 4.2.4 '*Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure'*. Paragraph 4.2.5 '*This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means:* […] • *for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System'* Paragraph 3.3.63 of EN-1 confirms (emphasis added): '*3.3.63* […] *the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy.* ***Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible***.'

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		special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.	with the Applicant's approach because the CNP policy approach can only be applied after the mitigation hierarchy has been applied in light of an adequate level of information. ECC has consistently flagged that the Applicant has provided inadequate information on archaeological impacts; that remains the case (see ECC's Deadline 3 Response, paragraph 5.13ff). Accordingly, the CNP policy approach cannot yet be applied to residual impacts in relation to archaeology v. Flood Risk: So long as the appropriate mitigations are included in the CEMP and secured in the DCO (REP1-161, paragraphs 4.7.20-4.7.26)) , ECC agrees that there will not be residual impacts from flooding. Turning to the areas where the CNP policy approach is disapplied: vi. Human health and public safety: ECC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing as outlined in ECC's LIR (REP1-161 - paragraphs 4.9.16-4.9.55)) vii. Defence: ECC defers to the Ministry of Defence and other relevant bodies on the matter of defence. viii. Irreplaceable habitats: There are several irreplaceable habitats within or adjacent to the Order Limits. The Arboricultural Impact Assessment (AIA) should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees. Mitigation must be secured via the Requirements of the DCO. ECC agrees that the feeling of veteran trees is the type of residual harm that falls outside of the application of CNP policy ix. Flood Risk: Please refer to the comments in ECC's LIR (REP1-161). x. The HRA: No comment The 2025 NPSs do not change this analysis or add anything material.	Paragraph 4.1.7 of EN-1 provides a further presumption in favour of granting consent that is applicable to CNP infrastructure (emphasis added): '*Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development.* ***For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases****. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.*' Paragraphs 4.2.6-4.2.8 of EN-1 provide that the CNP policy does not create an additional need case beyond what is already provided in EN-1 but is relevant specifically in reference to consideration of residual effects in Secretary of State decision-making (the detail of how this applies is set out in 4.2.15-4.2.17): Paragraph 4.2.6 '*The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.*' Paragraph 4.2.7 '*The CNP policy* ***does not*** *create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure.* ***The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State***'. Paragraph 4.2.8 '*During decision making, the CNP policy will influence how non-HRA and non-MCZ residual*
			Chelmsford City Council **Human health and public safety**: CCC maintains concerns regarding the effects of the proposal upon human health and public safety. Please refer to CCC'S LIR (REP1 -153) relating to Air Quality, Health and wellbeing and Noise and Vibration. **Defence**: CCC defer to the Ministry of Defence and other relevant bodies on this matter.	

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			Irreplaceable Habitats: CCC is concerned that there is no reference to Irreplaceable habitats at Langley's Grade 1 listed house and garden. CCC refers to the comments raised by Essex County Council (ECC) Place services as included within its LIR (REP1-153). **Flood Risk**: CCC defers to ECC as Local Lead Flood Authority. Please refer to CCC'S LIR (REP1 -153). **Green Belt**: CCC's view is that the very special circumstances put forward by NGET do not justify the inappropriate development that the proposal would have on the Chelmsford section of the Green Belt. Please refer to CCC'S LIR (REP1-153) and comments to LUS1.12 below. **SSSi**: There are no SSSI's within Chelmsford that would be materially affected by the proposal. **Nationally designated landscapes and heritage assets**: **Nationally designated landscapes**: CCC disagrees with assumption that only proposals within a nationally designated landscape. Please refer to CCC'S LIR (REP1- 153) **Nationally designated heritage assets** CCC consider the proposal underestimates the impact upon many heritage assets. The greatest impacts are at the section of route between Little Waltham and Great Waltham, near to Langleys and its Registered Park and Garden, where the harm to the Great Waltham and Little Waltham Conservation Areas is underestimated, resulting in moderate effects, which are significant. Please refer to CCC's LIR (REP1-153) On archaeology Sections 7.2.56-57 of APP-085 consider Substantial harm to or loss of significance to Heritage Assets. Section 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The harm is considered necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. Based on our current knowledge of archaeological remains which may be impacted upon by the development there is agreement with the Applicant. However, clear outwaying of harm can only be demonstrated when an adequate level of	*impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.*' None of the exceptions in paragraph 4.1.7 apply to Norwich to Tilbury (this is addressed in **5.6 Planning Statement [APP-085]**). Therefore, when the non-HRA (Habitats Regulation Assessment) and non-MCZ (Marine Conservation Zone) residual effects of CNP Infrastructure after mitigation are to be weighed against the benefit/need for the Project, the benefit/need will outweigh the residual effects (and so consent should be granted) in '*all but the most exceptional cases*'. This is followed by paragraphs 4.2.15 - 4.2.17 of EN-1, which highlight the strength of the further presumption applicable to CNP infrastructure (i.e. in addition to the presumption in para 4.1.3) in relation to any tests set out within the NPSs, or any other planning policy, that apply to a DCO application for CNP infrastructure (emphasis added): Paragraph 4.2.15 '***Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts****. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.*' Paragraph 4.2.16 '*As a result, the Secretary of State will take as the starting point for decision making* ***that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances***'.

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			information has been provided and the application has not submitted a sufficient level of information for this to be demonstrated with confidence. **HRA**: Please refer to CCC'S LIR (REP1-153), CCC has no specific comments. **Brentwood Borough Council** With regard to human health and public safety, BBC maintains concerns regarding long term impacts, including mental health and wellbeing, particularly where these have been alerted to the Council (see response to HW1.8 below). With regard to heritage assets, BBC considers that further information is required to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored, and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed. With regard to flood risk, irreplaceable habitats and heritage assets, BBC supports any comments provided by ECC. **Norfolk County Council** Flood risk Paragraphs 10.4 to 10.7 of our LIR **[REP1-173]** set out NCC's interpretation of CNP policy as it relates to flood risk. In summary, CNP policy applies in the context of justifying an increase in flood risk against benefits; it does not justify deviation from mandatory technical requirements of policy. The flood risk section (5.8) of NPS EN-1 sets requirements which are not related to the balancing exercise, in particular those set out in paragraph 5.8.36, but also generally under the "Applicant's assessment" crossheading. The paragraph 5.8.36 requirements are that the SoS should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy	Paragraph 4.2.17 '*This means that the Secretary of State will take as a starting point that CNP Infrastructure* ***will meet the following, non-exhaustive, list of tests****:* • *where development within a* ***Green Belt*** *requires very special circumstances to justify development;* • *where development within or outside a* ***Site of Special Scientific Interest (SSSI)*** *requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;* • *where development in* ***nationally designated landscapes*** *requires exceptional circumstances to be demonstrated; and* • *where* ***substantial harm to or loss of significance to heritage assets*** *should be exceptional or wholly exceptional.*' These policies in paragraphs 4.2.16-4.2.17 of EN-1 require the Secretary of State to take as a starting point for decision-making for CNP infrastructure, that it '*is to be treated as if it has met any test within the NPS, or any other planning policy, which requires a clear outweighing of harm*', including in highly protected spaces like the Green Belt, National Landscapes and SSSIs. In other words, the Secretary of State will take as their starting point that the bar for such tests has been cleared by virtue of a project being CNP. In responding to GEN 1.6, a number of the local authorities have sought to identify where they consider that there is insufficient certainty to demonstrate that residual impacts are acceptable. Responses are typically grouped into the following topics: • Green Belt • SSSI • Designated Landscapes • Heritage Assets • Flood Risk • Human Health • Defence • Irreplaceable Habitats • HRA.

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			• SuDS (as required in [paragraph 5.8.37] on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance EN-1 is clear that an exception to CNP policy applies in cases where a project would present an unacceptable risk to CNP also does not override the requirement in paragraph 5.8.40 that where a flood risk management authority (like the LLFA) continues to object to the grant of development consent, the Secretary of State would need to be satisfied that "all reasonable steps have been taken by the applicant and the authority to try and resolve the concerns" before consent can be granted. As it stands, NCC as the lead local flood authority has serious concerns about the flood risk assessment ("FRA"), which are detailed in our relevant representation and our LIR. The drainage strategy submitted at deadline 1 [REP1-072] is wholly insufficient at providing evidence in the ES's conclusions as to residual impacts. NCC cannot at this stage agree that the project would avoid increasing flood risk on-site or elsewhere, or that the residual impacts on flood risk would present an acceptable risk. Irreplaceable habitats The CNP exception for irreplaceable habitat is framed in the same terms, i.e. that the CNP presumption does not apply where residual impacts present an unacceptable risk to or unacceptable interference with irreplaceable habitats. The normal policy requirement for irreplaceable habitats is that: *"The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless*	This response seeks to address each of the points made against the above topics. **Green Belt** The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. Chelmsford City Council considers that the very special circumstances put forward by the Applicant do not justify what the Council considers to be the inappropriate development within the Green Belt. An assessment on the Green Belt can be found in **5.6 Planning Statement [APP-085]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The assessment in the Planning Statement sets out that the Applicant considers that the proposed Tilbury North Substation and Cable Sealing End (CSE) compound works may be considered inappropriate development as they would not preserve the openness of the Green Belt. Very special circumstances would be required to justify their acceptability. Conversely, the Applicant considers that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt. Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. **5.6 Planning Statement [APP-085]** and the Applicant's response to Written Question LUS 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** detail the very special circumstances applicable in this instance to justify inappropriate development. For ease of reference these are: • UK government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used • The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by the 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term

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			there are wholly exceptional reasons [footnote 192: For example where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat.] and a suitable compensation strategy exists." (paragraph 5.4.53 of EN-1, emphasis added). Leaving to one side the exception, the presumption is that CNP infrastructure is to be treated as if it has met any test which requires a clear outweighing of harm, exceptionality or very special circumstances (found in paragraphs 4.2.16 and 4.2.17 of EN-1). The CNP presumption does not affect the element of paragraph 5.4.53 which requires the provision of a suitable compensation strategy. The CNP presumption also does not affect the assessment and mitigation requirements of paragraphs 5.4.17 and 5.4.32 of EN-1, which include that applicants should "include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases". The applicant's policy compliance tracker notes against paragraph 5.4.53 (or 5.4.55 in the updated EN-1) that "All ancient woodland is set out within Table A8.1.6 of ES Appendix 8.1: Habitat Report and presented in ES Figure A8.1.3: Ancient Woodland Locations [both within AS-028]", however NCC note that this the applicant's assessment is incomplete because it does not include the ancient wood pasture at Meadow Wood. Further information on this wood pasture can be found at paragraphs 6.14 to 6.18 and 6.24 of NCC's LIR and in Norfolk Wildlife Trust's written representation [REP1-257]. Other CNP exceptions NCC has no specific comment to make on the other CNP exception subjects. **South Norfolk District Council** CWS 2348 Meadow Wood Nature Reserve • The Planning Statement APP-085 refers to the Ancient Woodland and Veteran Tree Strategy. This strategy needs updating to reflect the recent designation of land adjacent to CWS 2072 Brick Kiln Lane, Bunwell Hill, as CWS 2348 Meadow Wood Nature Reserve which is likely ancient wood pasture. It was designated as a CWS in March 2026. The impact on irreplaceable habitat is significant.	• New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected in East Anglia by 2030. These connections are being constructed or are expected to connect to substations at Necton, Norwich Main, Bramford, Friston and Sizewell • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required • The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy with low-carbon electricity • By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030. The need case justifies the Project's very special circumstances and subject to the application of mitigation, the Project's CNP infrastructure meets the requirement to justify development and the Green Belt test. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '[…] *the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests: Where development within a Green Belt requires very special circumstances to justify development'*. **SSSI** The Applicant welcomes the responses from Essex County Council, Braintree and Tendring which note that the application of the mitigation hierarchy has resulted in a design which avoids any impacts on SSSIs. Suffolk County Council and Babergh and Mid Suffolk have queried the assessment for natural heritage value when part of a SSSI and Ramsar site are in the Wooded Valley Meadowlands. The Applicant acknowledges Suffolk County Council's query relating to the Wooded Valley Meadowlands Landscape Character Type (LCT) and the judgement of 'medium' applied to natural heritage. The Landscape Value Assessment presented in **Appendix A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** acknowledges the presence of the nature reserve, SSSI and a small area of the Ramsar

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			• It is acknowledged that the design has sought to avoid irreplaceable habitats (and SSSIs) but following the identification of potentially ancient wood pasture at the newly designated CWS 2348 Meadow Wood Nature Reserve the order limits of the DCO should now be re-visited and every effort made to avoid impacts (from the new OHL and undergrounding of the existing OHL) on the irreplaceable habitat now it has been identified. • It is requested that in the first instance consideration is given to undergrounding the OHL or amending the DCO corridor to avoid impacts. • Options proposed in section 4.4. of EN020027 000295-5.15 Design Development Report.pdf need to be re-visited and visualisations provided (based on topographical surveys and arboricultural input) demonstrating how the design will avoid and minimise impacts. • Undergrounding to the existing OHL also needs to be refined to avoid significant impacts to VG404. Bespoke Mitigation • NG proposal for additional and bespoke mitigation measures set out in 7.4 Outline Landscape and Ecological Management Plan Appendix B- Ancient Woodland and Veteran Tree Strategy are outline and subject to collaboration with the landowners which provides a high degree of uncertainty due to the exact details being brought forward at the Discharge of Requirement stage. It would be necessary for NG to review mitigation provided for the loss of veteran trees for other NSIPS and quantify what their proposal is. • NG are also committed to maintain and monitor compensation for a minimum of 30 years however the 30-year period is not considered to be sufficient given the nature of the irreplaceable habitat, and therefore, NG should be responsible for maintenance/management of compensatory habitat for the lifespan of the proposal. Surveys • The arboricultural surveys are not complete so further veteran trees, and possibly ancient trees are likely within the order limits, and need to be considered in the Ancient Woodland and Veteran Tree Strategy. • We are concerned that pre-commencement works can commence without the completion of	within the LCT. The natural heritage value judgement has been reviewed against the landscape value judgements assessed in Annex A of **[APP-228]**. The Applicant is satisfied that, if the judgement for natural heritage increased to medium-high, the overall evaluation for the Wooded Valley Meadowlands LCT remains 'medium-high'. Taking into account the sensitivity, which has been judged to be high, and that there are no direct impacts resulting from the Project on this LCT, the assessment would remain unchanged, and no significant effects are anticipated in this LCT. Paragraph 4.2.17 (bullet point 2) of NPS EN-1 sets out that the Secretary of State will take as the starting point for CNP infrastructure, that it has met the following test: '*Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs.*' The Project mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases. This has been achieved through a considered and iterative design process which follows the mitigation hierarchy, and which avoids adverse effects on SSSIs. **Designated Landscapes** Essex and Suffolk County Councils, Babergh and Mid Suffolk, Tendring and Braintree defer to the National Landscape Partnership in identifying measures necessary for the Secretary of State to discharge their Statutory Duty. Consideration has been given to the duty to seek to further the purposes of the Dedham Vale National Landscape. In addition to the embedded mitigation including commitment to underground the cables through the National Landscape and its setting, additional measures include a Dedham Vale National Landscape Fund and a commitment to undertake an initial feasibility study considering the future removal of an existing 132 kV overhead power line. Further detail on the approach to the duty is set out in the Landscape and Visual - Furthering the Purposes of the National Landscape section in this document, and in **5.10 National**

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			arboricultural surveys or submission of an AMS and TPP to the LPA for approval. There is also no mechanism for securing compensatory planting or net gains for land affected by pre-commencement works. • EN020027-000201-7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy.pdf • The strategy needs to consider each veteran tree individually (not group them together). Ancient trees also need considering if they are found because of further arboricultural surveys. • Any Impacts on irreplaceable habitat is unacceptable – the red line needs moving or horizonal directional drilling utilized. Pre-commencement Works While the Ancient Woodland and Veteran Tree Strategy will be discharged through Requirement 4 it does not apply to pre-commencement works. It is requested that an Ancient Woodland and Veteran Tree Strategy is provided which covers pre-commencement works and that Mechanisms are in place to ensure that arboricultural surveys are completed prior to the detailed design for the pre-commencement works, and that an AMS and TPP for the pre-commencement works are prepared and submitted to the LPA for approval.	**Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. Colchester City Council comments that as per EN-5, the Project should have avoided the Dedham Vale National Landscape altogether. Addressing the specific comment regarding avoiding the National Landscape, as described in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** 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. 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. In terms of the consideration of alternatives, the Project has been developed to be consistent with NPS EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for electricity networks development. At each stage of the Project a consistent level of information has been used to support decision
			Colchester City Council Green Belt: No comment in respect of Green Belt as there is no green belt in the CCC area. SSSIs: No comment in respect of SSSIs. Designated landscapes: As set out in other question responses below, CCC are clear that as Per NPS-EN5 the Dedham Vale should have been "avoided altogether" and that 'Even residual risk is unlikely to be acceptable in planning terms'. Heritage assets: CCC consider that further information to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed is required. Sections 7.2.56-57 of APP-085 consider Substantial harm to or loss of significance to Heritage Assets. Section 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. However, clear outweighing of harm can only be	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			demonstrated when an adequate level of information has been provided, and the application has not submitted a sufficient level of information for this to be demonstrated with confidence. Human health and public safety: CCC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing. Please refer to the CCC LIR [REP1-156]. Defence: Defer to the Ministry of Defence and other relevant bodies on the matter of defence. Irreplaceable habitats: The AIA should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees Flood risk: Please refer to the CCC LIR **[REP1-156]**. The HRA: No comment. **Thurrock Council** The Council acknowledges the national policy position in NPS EN-1 (2023), including the urgent need for energy infrastructure and the potential for the Proposed Development to qualify as CNP infrastructure. However, as set out in NPS EN-1 paragraph 4.2.7, CNP policy is to be applied following the proper assessment of impacts and application of the mitigation hierarchy. The Council considers that the Applicant's reliance on CNP policy is premature, given that a number of impacts identified in the Council's Local Impact Report (LIR) remain insufficiently assessed, unresolved, or subject to outline mitigation. The Council has identified concerns in respect of public health and public safety, cumulative effects, and ecology. The LIR (Sections 6.6 and 6.8.6) identifies the potential for significant adverse construction noise effects and highlights that cumulative health impacts, particularly in combination with other major developments such as the Lower Thames Crossing, have not been adequately assessed. Similarly, the LIR (Section 6.3) raises concerns regarding ecological mitigation, biodiversity net gain, and protected species, with the Applicant acknowledging that a number of these matters remain under discussion. The Council does not consider that sufficient certainty has been provided to demonstrate that residual impacts in these areas are acceptable. In respect of other policy tests, including flood risk, Green Belt, SSSIs, landscape, and heritage, the Council considers that compliance is dependent on the resolution of outstanding matters and the securing of detailed	making between alternatives, leading to the selection of the preferred option. Paragraph 2.9.20 of NPS EN-5 says that although overhead line should be the strong starting presumption for electricity network developments in general, that presumption is reversed for nationally designated landscapes. It should be noted that routeing through a National Landscape is not in conflict with NPS EN-1 or EN-5. 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 [APP-235]**. 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. Finally, the Applicant notes that the response from Chelmsford City Council on this point was incomplete and is therefore unable to respond. Clarification is sought. **Heritage Assets** In responding to this question, Essex County Council, Chelmsford City Council, Colchester City Council, Braintree and Tendring express the view that they cannot agree with the Applicant's approach to applying the CNP policy due to a perceived lack of information on archaeology and as such, uncertainty over the nature of residual impacts in relation to archaeology. Suffolk County Council, Babergh and Mid Suffolk, Brentwood, and Colchester City Council consider that further information is required to demonstrate how embedded mitigation informed final design choices,

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			mitigation. At present, a number of these measures remain at an outline stage, limiting the ability to conclude that impacts have been fully avoided, reduced, or mitigated in accordance with the mitigation hierarchy.	whether alternative alignments or pylon locations were fully explored, and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed.
			Babergh and Mid Suffolk District Council Green Belt: No comment in respect of Green Belt. SSSIs: BMSDC query the Medium judgment for Natural Heritage value when part of an SSSI and a Ramsar site are in the Wooded Valley Meadowlands LCT. Please refer to the SCC / BMSDC Joint LIR **[REP1-178]**. Designated landscapes: BMSDC refer to the submissions of the National Landscape team and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation. Heritage assets: BMSDC consider that further information to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed is required. Human health and public safety: BMSDC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing. Please refer to the SCC / BMSDC Joint LIR **[REP1-178]**. Defence: Defer to the Ministry of Defence and other relevant bodies on the matter of defence. Irreplaceable habitats: The AIA should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees Flood risk: Please refer to the SCC / BMSDC Joint LIR **[REP1 178]**. The HRA: No comment	The Applicant has responded regarding amount of archaeological survey information available in response to ExQ1 HE 1.43, in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant considers that it has provided proportionate and suitable archaeological evaluation for the Project, in accordance with paragraphs 5.9.11 and 5.9.12 of NPS EN-1. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets where possible. **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. **6.11.A7 Assessment of Harm to Designated Assets [APP-215]** demonstrates that the Project will not result in substantial harm to designated heritage assets, although it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting.
			Braintree District Council Green Belt: No comment in respect of Green Belt. SSSIs: N2T's strategic mitigation has resulted in a development route that avoids any predicted impacts on SSSIs. Designated landscapes: BDC refer to the submissions of the National Landscape team and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation. Heritage assets: (a) The scheme results in less than substantial harm to affected built heritage assets. However, the proposals would not preserve the setting of	The Project has followed the mitigation hierarchy and given consideration to sustaining and enhancing the significance of heritage assets where this is possible. Compensatory measures have been considered as part of the development of the Project in relation to the mitigation hierarchy but the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated. As set out in previous responses **5.15 Design Development Report [APP-122]** provides an explanation of the main changes in design resulting from consultation and the Applicant's response to HE 1.36 sets out the mitigation considered and implemented for

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			those assets and therefore do not comply with Sections 66(1) or 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. However, Local Polices dictate the planning balance applies in these scenarios. (b) Section 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The harm is considered necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. Based on our current knowledge of archaeological remains which may be impacted upon by the development there is agreement with the Applicant. However, clear outweighing of harm can only be demonstrated when an adequate level of information has been provided and the application has not submitted a sufficient level of information for this to be demonstrated with confidence. Human health and public safety: BDC defer to Essex County Council. Defence: Defer to the Ministry of Defence and other relevant bodies on the matter of defence. Irreplaceable habitats: The AIA should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees	heritage assets assessed as experiencing a mid level of less than substantial harm (**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**). The Applicant provided information regarding the assessment of LoD in response to ExQ1 HE 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant would highlight that the various Design Development Reports **[APP-122**, **APP-358**, **APP-359**, and **APP-360]**, submitted by the Applicant in the application for development consent have explained the derivation of the route and revisions including in response to the potential for effects on heritage assets. Without further detail on specific assets the Council is concerned with, it is not possible to respond further. With regard to the Council's reference to the need for further information to demonstrate how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed, the full extent of Limits of Deviation are assessed within the Environmental Statement (including effects on heritage assets). The assessment is within the sensitivity testing section in each environmental topic chapter. Therefore, if the Main Works Contractor(s) use the Limits of Deviation during detailed design, effects would not be beyond those assessed.
			Tendring District Council The Applicant correctly states the position in paragraph 3.2.5. There, the Applicant does not treat CNP policy as a freestanding additional aspect of the need case, but as a policy lens that applies after the ordinary assessment of need and the application of the mitigation hierarchy to the effects of the project. The Applicant correctly emphasises that, where there are residual non Habitats Regulations impacts after all possible mitigation has been applied, the urgent need for CNP infrastructure, together with other benefits, will generally support grant of permission because it outweighs those residual impacts (unless exceptions apply). The Applicant rightly does not suggest that the fact that the project is CNP Infrastructure means it is subject to any less stringent obligations to mitigate impacts through the full application of the mitigation hierarchy (see especially paragraphs 7.1.7-7.1.12 on the requirement to apply the mitigation hierarchy). CNP policy applies only to residual, non-Habitats Regulations, impacts. Focusing on the Applicant's approach to residual impacts from paragraph 7.2.52 onwards:	**Flood Risk** The Applicant welcomes the agreement from Essex County Council, Tendring District Council and the Environment Agency that following the implementation of appropriate mitigation there will not be residual impacts from flooding. Flood risk mitigation is detailed in Table 1.1 of **7.9 Flood Risk Assessment [APP-331]** and are secured through Requirement 4 of **3.1 Draft Development Consent Order [Revision D]** through the inclusion of commitments within **7.2 Outline Code of Construction Practice [Revision D]**. The Applicant notes concerns expressed by Norfolk County Council with regard to the need for the Project to avoid increasing flood risk on-site or elsewhere. The Applicant also notes the view of Norfolk County Council that the residual impacts on flood risk would present an acceptable risk. The Applicant notes that other authorities have

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			1. Green Belt: TDC has no specific comments to make in respect of green belt but would defer to district authorities within Essex where there is designated green belt land affected by the proposal. 2. SSSI: TDC agrees that the Applicant's strategic mitigation has resulted in a development route that avoids any predicted impacts on SSSIs. 3. Designated landscapes: TDC defer to the submissions of the National Landscape team in respect of the Dedham Vale National Landscape and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation. 4. Heritage assets: Paragraphs 7.2.56-57 of APP-085 consider Substantial harm to or loss of significance to Heritage Assets. Paragraph 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The harm is considered necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. TDC cannot agree with the Applicant's approach because the CNP policy approach can only be applied after the mitigation hierarchy has been applied in light of an adequate level of information. Accordingly, the CNP policy approach cannot yet be applied to residual impacts in relation to archaeology. 5. Flood Risk: So long as the appropriate mitigations are included in the CEMP and secured in the DCO (REP1-161, paragraphs 4.7.20-4.7.26)), TDC agrees that there will not be residual impacts from flooding. Turning to the areas where the CNP policy approach is disapplied: 1. Human health and public safety: TDC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing as outlined in ECC's LIR (REP1-161 – paragraphs 4.9.16-4.9.55). 2. Defence: TDC defers to the Ministry of Defence and other relevant bodies on the matter of defence. 3. Irreplaceable habitats: There are several irreplaceable habitats within or adjacent to the Order Limits. The Arboricultural Impact Assessment (AIA) should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees. Mitigation must be secured via the Requirements of the DCO. TDC agrees that the	signposted back to the responses presented in their Local Impact Reports. Responses to the issues raised by Essex County Council, Colchester City Council, Chelmsford City Council, Suffolk County Council and Babergh and Mid Suffolk in their Local Impact Report with regard to flood risk are provided in Table 4.18 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. An assessment of effects on Hydrology, Land Drainage and Flood Risk (**6.12 Environmental Statement Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** have been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and in line with the requirements of national and local policy and guidance. Assessments have been scoped through engaging with the Environment Agency and the Lead Local Flood Authorities (LLFAs) and have been informed by a range of data sources, including outputs from Environment Agency flood models. **7.9 Flood Risk Assessment [APP-331]**, and **7.10 Water Framework Directive Assessment [APP-332]** have been reviewed by the Environment Agency and the LLFAs prior to submission and their feedback has been incorporated into the documents. General agreement has also been reached regarding the conclusions of these assessments. The Applicant has been engaging with Norfolk County Council. The matters raised by the Council have also been responded to in Table 4.18 of document **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant also confirms that **8.2 Drainage Strategy DCO [Revision B]** has been updated by the Applicant to address comments raised by each of the LLFAs, for submission at Deadline 4. To avoid increasing flood risk on-site and elsewhere, a range of control and management measures have been secured through the DCO. These are detailed in several commitments within **7.2 Outline Code of Construction Practice [Revision D]** and are based on good practice, as well as bespoke measures agreed with the Environment Agency. The Applicant also notes that the Environment Agency and several of the other LLFAs have confirmed that,

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			feeling of veteran trees is the type of residual harm that falls outside of the application of CNP policy 4. Flood Risk: Please refer to section 16 Hydrology, Land Drainage and Flood Risk of Tendring District Council (TDC) Norwich to Tilbury (N2T) – Local Impact Report. 5. The HRA: No comment The 2025 NPSs do not change this analysis or add anything material. **Suffolk County Council** As an introductory and over-arching point, SCC does not agree with the Applicant's approach to the CNP policy or with the Applicant's conclusions that the residual effects on matters of human health, public safety, irreplaceable habitats, and flood risk, after the mitigation proposed by the Applicant, are in all cases not significant adverse effects and/or not unacceptable risks or interference. SCC agrees with the ExA's introductory comments that the CNP policy applies after the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. The CNP policy is not, therefore, a justification for not providing full mitigation to address impacts so far as reasonably practicable or for providing compensatory or offsetting measures for impacts that cannot reasonably be mitigated (or further mitigated). The CNP policy only applies to any residual impacts remaining after that exercise has been conducted. As set out in the Joint Suffolk LIR [REP1-178] SCC has several concerns about the adequacy of the Applicant's proposed mitigation and/or failure to provide compensatory or offsetting measures. SCC does not therefore accept that the Applicant has, in all cases, followed the mitigation hierarchy as regards the proposals as currently formulated. SCC disagrees with the apparent suggestion in para 7.2.6 of the Planning Statement [APP 085] that "it is unlikely that consent will be refused on the basis of these residual impacts" (affecting matters falling within the exceptions to the CNP policy). In terms of the exceptions, the issue to be determined (but only after the full application of the mitigation hierarchy) is whether any remaining residual impacts are such that they present an unacceptable risk to or unacceptable interference with the receptor in question. What is 'unacceptable' is a matter of planning judgment having regard to the specific circumstances. These matters ae considered below.	subject to implementation of these measures, there will not be a residual impacts from flooding. The Applicant considers that the Project would not present an unacceptable risk to, or unacceptable interference to flood risk. Accordingly, the CNP policy remains engaged. **Human Health** The Applicant notes that Essex County Council, Chelmsford City Council, Brentwood, Colchester City Council, Babergh and Mid Suffolk, Braintree (deferring to Essex County Council), Tendring District Council, Thurrock Council and Suffolk County Council raise concerns regarding long-term impacts on public health and safety, including mental health and wellbeing. The authorities do not agree that the impacts of the Project (and the cumulative impacts with other projects) would have no significant impacts on human health and wellbeing. Suffolk County Council has outstanding concerns in relation to the impacts on human health from the proposed construction hours and from the effects on the Public Rights of Way network, highway network, and access to healthcare, social infrastructure, nature and open spaces. Thurrock raises the same issue and specifically references Lower Thames Crossing and the potential for cumulative health impacts. Brentwood Borough Council also references its response to WQ1 HW 1.8 and receipt of representations from households with individuals with protected characteristics as per the Equalities Act 2010 and also with complex sensory needs. Paragraph 4.2.15 of EN-1 states that residual impacts are unlikely to outweigh the urgent need for this type of infrastructure in '*all but the most exceptional circumstances*' and references exceptions as including where residual impacts present an unacceptable risk to, or unacceptable interference with, human health and public safety, amongst other exceptions. No significant impacts on human health have been identified in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. While adverse impacts have been identified in relation to mental health and wellbeing (for example in relation to stress and anxiety caused by the uncertainties associated with a project of this scale and nature, anxieties about the impacts of construction

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Green Belt SCC has no comment. SSSIs SCC queries the medium judgment for Natural Heritage value when part of an SSSI and a Ramsar site are in the Wooded Valley Meadowlands LCT. Please refer to the Joint Suffolk LIR **[REP1-178]**. Designated landscapes SCC defers to the National Landscape Partnership and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation. Heritage assets SCC considers that further information to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed is required. Human health and public safety SCC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing. SCC does not agree that the impacts of the project (and the cumulative impacts with other projects) would have no significant impacts on human health and well-being (as stated in para 7.2.7 of **[APP 085]**) nor that the residual impacts are not an unacceptable interference with (human) receptors (as stated in para 7.2.29 of [APP 085]). In particular, SCC has outstanding concerns in relation to the impacts on human health from the proposed construction hours and from the effects on the public rights of way network, highway network, and access to healthcare, social infrastructure, nature and open spaces. Please refer to the Joint Suffolk LIR **[REP1 178].** Defence SCC defers to the Ministry of Defence and other relevant bodies on the matters related to defence. Irreplaceable habitats	activities over a long period of time, and anxieties associated with environmental change/sense of place during the operation (and maintenance) phase), these are not considered to present an unacceptable risk by virtue of mitigation and compensatory measures that can be undertaken and which are proposed. Ways to manage and/or mitigate potential mental health impacts have been identified by the Applicant and are set out in the response to HW 1.13 (for example, ensuring there is clarity for residents and communities in relation to the pre-construction and construction process through effective community liaison; the requirement for a detailed Communications Strategy has been secured in **7.2 Outline Code of Construction Practice [Revision D]**). In relation to Brentwood Borough Council's comments relating to specific concerns alerted to the Council, the Applicant confirms that arrangements are being made to understand these further and will ensure the Council is kept updated in this matter. With regard to cumulative effects raised by Thurrock Council, **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**, as updated by **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**, has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. The chapter considers the cumulative impacts from multiple projects, on health and wellbeing. The Lower Thames Crossing is one of the projects included in the cumulative assessment. With regard to potential noise and vibration effects **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** includes an assessment of construction traffic noise which includes committed developments, including Lower Thames Crossing. In relation to effects on the Public Rights of Way network, highway network, and access to healthcare, social infrastructure, nature and open spaces, the Applicant considers that, in addition to community liaison described earlier, these effects would be appropriately mitigated through the **7.6 Outline Public Rights of Way Management Plan [Revision B]** and **7.3 Outline Construction Traffic Management Plan [Revision C]**.

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			The AIA should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees Flood risk Please refer to the Joint Suffolk LIR [REP1 178]. Habitats Regulation Assessment SCC has no comment.	The assessment of impacts on health and wellbeing presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** is robust and complies with guidance set out in NPS EN-1. Health and wellbeing impacts have been assessed in accordance with information presented in **6.20 Scoping Opinion [APP 297]** and health determinants identified in Table 10.4 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The Applicant maintains that the Project would not present an unacceptable risk to human health and public safety. Furthermore, the Applicant would highlight Paragraph 4.4.7 NPS EN-1 (2024) on health and Secretary of State decision making: Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.
				Defence All local authorities commenting on defence, deferred the matter to the Ministry of Defence and other relevant bodies. As noted below, on 24 April 2026 the Defence Infrastructure Organisation (DIO) advised the Applicant it had completed its assessments of Project impacts on defence safeguarded assets (including the East 2 WAM Network, and technical assets as well as aviation operations at Wattisham Station aerodrome). The DIO has also drafted requirements for measures to mitigate impacts to enable the withdrawal of the current Ministry of Defence (MoD) objection to the Project. The Applicant is currently reviewing the technical feasibility of the requested mitigation measures but is confident ongoing collaboration, as well as flexibility within the Project design Order Limits, can enable appropriate, realistic and pragmatic solutions to be agreed, in accordance with EN-1 (2024), paragraph 5.5.53. As a result of these developments, the Applicant considers there to be a significant likelihood of the removal of the MoD objection. Our position is therefore

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				maintained that there is no evidence an unacceptable residual impact of the Project on defence would exist after mitigation to disapply the CNP presumption. **Irreplaceable Habitats** Colchester City Council, Babergh and Mid Suffolk District Councils, Braintree District Council, Tendring District Council and Suffolk County Council seek confirmation that the Arboricultural Impact Assessment (AIA) should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees. The Applicant agrees with this approach to reducing loss of trees where reasonably practicable. Impacts to veteran trees are currently reported as a reasonable worst-case scenario and will be reviewed during the detailed design to determine if impacts can be further avoided and/or reduced. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that, following detailed design and prior to construction, surveys will 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 D]**. Further commitments in relation to retaining trees and hedgerows include B08 and LV04. Chelmsford City Council express concern that there is no reference to Irreplaceable habitats at Langleys Grade 1 listed house and garden. The Grade II Langleys Registered Park and Garden is approximately 40 m north-west of the Order Limits and is therefore outside the Study Area (Order Limits plus 30 m) for veteran and ancient trees as per **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. Langleys Great Waltham Deer Park, ancient woodland approximately 380 m north-west of the Order Limits, is additionally outside of the Study Area for ancient woodland (Order Limits plus 200 m). There would be no impact on these habitats. Two veteran trees (T908 and T909) were recorded as part of the arboricultural surveys close to the boundary (but outside) of the Langleys Registered Park and Garden. Both of these trees have been assessed as not removed by the Project in the **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) EN020027 - Norwich to Tilbury**

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				Document Index Transmission (NGET) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]. With regard to the feedback from Norfolk County Council regarding veteran trees, the Applicant would advise that impacts to veteran trees are currently reported as a reasonable worst-case scenario and will be reviewed during the detailed design to determine if impacts can be further avoided and/or reduced. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that, following detailed design and prior to construction, surveys will 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 D]**. Further commitments in relation to retaining trees and hedgerows include B08 and LV04. It should be noted that Footnote 192 of Paragraph 5.4.53 within NPS EN-1 (2024) provides further clarity on the 'wholly exceptional reasons' for the loss or deterioration of any irreplaceable habitats, including veteran trees, stating, '*For example where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat*'. The public benefits of, and need for, the Project are set out in Chapter 3 of **5.6 Planning Statement [APP-085]**. Paragraph 5.4.53 of NPS EN-1 (2024) also requires that '*a suitable compensation strategy exists*' if there is a loss or deterioration of any irreplaceable habitats. Table 5.1 in **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]** details compensation measures for veteran trees. If the veteran trees cannot be retained during the detailed design stage, the compensation measures would be agreed on a case-by-case basis with landowners and detailed in the final Landscape and Ecological Management Plan to be agreed by the relevant Local Planning Authorities. The compensation measures proposed will be implementable and proportionate to the impacts attributed to the final detailed design. Norfolk County Council and South Norfolk District Council have also raised concerns regarding the perceived omission of ancient wood pasture at Meadow Wood following the newly designated Meadow Wood Nature Reserve County Wildlife Site (CWS). While not considered as a CWS in the ecological assessment due to the designation of the site in March 2026, after

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				submission of the development consent application, this area of woodland and grassland habitat has been included under the Habitats of Principal Importance (Section 41 of the Natural Environment and Rural Communities Act 2006) as an ecological receptor and has been fully assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The designation of this site as a CWS does not materially alter the conclusions of the assessment, that there will be no significant residual effects on CWSs or woodland habitat. While the site has been designated as a CWS for its woodland pasture habitat, it was not added to the latest ancient woodland inventory. While the woodland within the CWS as a whole is not considered irreplaceable habitat, veteran trees within the woodland are considered irreplaceable and are already covered within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. No further update to the Ancient Woodland and Veteran Tree Strategy is proposed with respect to Meadow Wood Nature Reserve CWS. As a Habitat of Principal Importance this area has been given significant weighting in routeing design decisions, with impacts minimised where practicable. No pylons or construction haul roads have been located within the CWS. Although the 400 kV overhead line would oversail the southern corner of the CWS, this meadow habitat would not be affected. A small area of tree loss/management within 28 m of the overhead line for electrical clearance reasons will be required within the CWS (0.06 ha). The trees in this area are native broad-leaved species that would re-grow from coppice stools or pollards that would be created within the electrical clearance zone. The route selected avoids removal of the veteran trees within the CWS. Impacts on veteran trees are considered in **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. The existing UK Power Networks 11 kV overhead line that currently passes through the CWS would be removed, and replaced underground outside the CWS boundary, providing an ecological benefit. Mitigation proposals for Meadow Wood Nature Reserve CWS would relate to the small impact on woodland habitat and this mitigation is already clearly set out in Section 9 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. For completeness, Meadow Wood Nature Reserve CWS has been added to the Outline Landscape and

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
				Ecological Management Plan. There will be no significant residual effects on Meadow Wood Nature Reserve CWS. South Norfolk District Council has also raised concerns regarding the need for bespoke mitigation. The Applicant has committed to bespoke mitigation for veteran trees and ancient woodland features through **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. The use of an outline framework with secured Requirements is standard practice for NSIPs and allows mitigation to be tailored through agreement with landowners ensuring ecological outcomes are deliverable and effective. Mechanisms for securing mitigation are therefore appropriate and legally enforceable. The proposed 30-year management and monitoring period reflects established best practice and aligns with national guidance for compensatory habitat within major infrastructure schemes. Responsibility for habitat management beyond this period would not be reasonable or proportionate, particularly where long-term stewardship can be secured through established conservation management arrangements. South Norfolk District Council has stated that the arboricultural surveys are not complete, so further veteran trees, and possibly ancient trees are likely within the Order Limits, and need to be considered in the Ancient Woodland and Veteran Tree Strategy. The Applicant acknowledges that arboricultural surveys are iterative; they will continue to be refined as access and programme allow. Reasonable steps were taken to identify ancient and veteran trees within the entire Project through a desk-based review of the Ancient Tree Inventory, followed by extensive field-based aboricultural surveys. DCO Requirements (Requirement 4: Construction Management Plans; and Requirement 8: Retention and removal of trees, woodland and hedgerows) within **3.1 Draft Development Consent Order [Revision D]** secure the completion of further surveys, including veteran and ancient tree assessment where required, prior to construction activities that could affect trees. **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]** allows for additional trees to be

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
				incorporated as they are identified, ensuring no material risk to unrecorded features. South Norfolk District Council has also raised concerns that while the Ancient Woodland and Veteran Tree Strategy will be discharged through Requirement 4, it does not apply to pre-commencement works. It is requested that an Ancient Woodland and Veteran Tree Strategy is provided which covers pre-commencement works and that mechanisms are in place to ensure that arboricultural surveys are completed prior to the detailed design for the pre-commencement works. Concerns regarding pre-commencement works are addressed through existing controls, including commitments within **7.2 Outline Code of Construction Practice [Revision D]** to prepare Arboricultural Method Statements and Tree Protection Plans proportionate to the scope of works, supported by arboricultural supervision. Pre-commencement works are limited and controlled, and there is no evidence that they would result in unacceptable impacts to irreplaceable habitat. Commitments GG08, GG14, B07, and LV05 within **7.2 Outline Code of Construction Practice [Revision D]** are applicable to tree protection. The Applicant notes the concerns from Thurrock Council with respect to woodland planting near Rainbow Shaw and the overlap with mitigation/ compensation planting for Lower Thames Crossing. The Applicant continues to work with Lower Thames Crossing to ensure that there would be no reduction in the amount of mitigation delivered by the two schemes. **Habitats Regulations Assessment (HRA)** No reference was made to HRA by Local Planning Authorities in responding to WQ1 GEN 1.6. **Net Zero** No reference was made to Net Zero and its importance within the context of CNP (Paragraph 4.1.7 of EN-1) by Local Planning Authorities in responding to WQ1 GEN 1.6. As set out in 5.6 Planning Statement [APP-085] the Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero.

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				In summary, taking into account the responses to GEN 1.6 by the Local Planning Authorities, although the Project is CNP infrastructure, this does not mean that it is subject to any less stringent obligations to mitigate impacts through the full application of the mitigation hierarchy. CNP policy applies only to residual, non-Habitats Regulations impacts. The urgent need for CNP infrastructure, together with other benefits, will generally support grant of permission because it outweighs those residual impacts (unless exceptions apply). The Applicant has applied the mitigation hierarchy to the Project as set out in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**. The Project will not present an unacceptable risk to, or interference with: • Human health and public safety • Defence • Irreplaceable habitats • Unacceptable risk to the achievement of net zero. Based on the above, it is established that in the case of the Project, the tests set out in paragraphs 4.2.16 - 4.2.17 of NPS EN-1 (2024) have been met. The Applicant has set out in Section 7 of **5.6 Planning Statement [APP-085]** that the benefits of the Project clearly and demonstrably outweigh residual adverse effects after the implementation of mitigation measures. The Project is in accordance with the Energy NPSs and the CNP presumption in favour of consent is clearly engaged. The Applicant would also reference the opinion provided by Russell Harris KC on the application of CNP **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1**
			Defence Infrastructure Organisation The applicant has set out how they have addressed the relevant assessment principle concerning Defence in their planning statement [App -085] at paragraphs 7.2.13 - 7.2.15. The statements made in paragraphs 7.2.13 and 7.2.14 accurately represent the safeguarding concerns that were identified by the Ministry of Defence (MOD) at the time that this planning statement was compiled (August 2025). It should be noted that since then, the MOD updated its safeguarding position, in the response made on 9th April 2026, identifying that the proposed development does infringe the technical site safeguarding zone protecting the East 2 WAM Network.	On 24 April 2026 the Defence Infrastructure Organisation (DIO) advised the Applicant it had completed its assessments of Project impacts on defence safeguarded assets (including the East 2 WAM Network, and technical assets as well as aviation operations at Wattisham Station aerodrome). The DIO has also drafted requirements for measures to mitigate impacts to enable the withdrawal of the current Ministry of Defence (MoD) objection to the Project. The Applicant is currently reviewing the technical feasibility of the requested mitigation measures but is confident ongoing collaboration, as well as flexibility within the Project design Order Limits, can enable

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			In addition, it also affects statutory height safeguarding zones protecting the critical airspace encompassing the aerodrome at Wattisham Station and the effective operation of air navigation aids located at this air base. It was also identified that further technical assessments are necessary to determine the potential impacts that may be caused by the development to fully account for the limits of variation relevant to the size and location of pylon structures that could occupy these statutory safeguarding zones. At paragraph 7.2.15, the applicant identifies that it is awaiting the outcome of MOD assessments. Despite this, at paragraph 7.2.29 – Summary of Project against CNP Policy – the applicant concludes that the Project will not present unacceptable risk or unacceptable interference to Defence. In view of the fact the relevant technical assessments have yet to be concluded, it is unclear how this conclusion has been reached and the MOD does not consider this statement to be valid at present. With respect to the applicant's Policy Compliance Tracker submission [REP1-133], in table 1.4 it is concluded that the Project demonstrates comprehensive application of the mitigation hierarchy through embedded mitigation, standard mitigation and compensation. At present, this conclusion cannot be considered to be applicable to Defence. At table 1.5 the applicant identifies that analysis demonstrates that residual impacts are minimised through the application of the mitigation hierarchy (avoidance, reduction, mitigation, compensation) so that no unacceptable health/safety risks are identified and net positive social/economic outcomes are achieved. This conclusion does not take account of the potential impacts to statutorily safeguarded defence infrastructure.	appropriate, realistic and pragmatic solutions to be agreed, in accordance with EN-1 (2024), paragraph 5.5.53. As a result of these developments, the Applicant considers there to be a significant likelihood of the removal of the MoD objection. Our position is therefore maintained that there is no evidence an unacceptable residual impact of the Project on defence would exist after mitigation to disapply the CNP presumption.
			General Aviation Awareness Council We respond as an Interested Party. The principle that this scheme is of Critical National Priority (CNP) is accepted. We agree that for projects which qualify as CNP, it is *likely* that the need case *may* outweigh the residual effects. However, paragraph 4.1.7 of EN-1 states a clear exemption from this presumption: "This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats…" Paragraph 4.2.10 makes clear that the applicant must: "…show how their application meets the requirements in this NPS…"	The Applicant recognises paragraph 4.2.15 of EN-1 (2024) with regard to residual impacts presenting unacceptable risk to, or unacceptable interference with, human health or public safety creating an exception to the CNP presumption. We agree paragraph 5.5.1 of EN-1 (2024) makes clear all aerodromes, as well as aviation technical sites, can be affected by new energy development. Furthermore, we recognise the emphasis placed on collaboration to ensure aviation safety, operations and capabilities are not affected, with a reciprocal requirement on aviation operators in relation to the enabling of infrastructure essential for net zero (EN-1 (2024), paragraph 5.5.5). EN-1 requires the respective needs and benefits of aviation and energy infrastructure to be appropriately balanced. This context is reflected

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			EN-1 places great weight on the role of aviation. It states: 5.5.1 All aerodromes, covering civil and military activities, as well as aviation technical sites, meteorological radars and other types of defence interests (both onshore and offshore) can be affected by new energy development. and: 5.5.7 It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, manned and unmanned air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure. National Grid defined the scheme, imposing the route on the aerodromes, and the collaboration referred to in paragraph 5.5.7 did not occur. From the first stages of the definition of this project in 2022, it has been clear that the scheme is principally focused around engineering design. Aviation safety was not addressed at the commencement of the project. The initial route evaluation process took no account of the presence of General Aviation aerodromes within the route corridor. There was only one reference to one airfield in the preliminary routing report, relating to Stow Maries Airfield, and this was not in relation to aviation operations, but rather in respect of its listed heritage value as a WW1 aerodrome. The Applicant's Planning Statement (APP-085), at paragraphs 2.4.30 and 2.4.31, introduces the Holford and Horlock Rules, which focus on engineering scheme design. These rules are then applied and frequently quoted as an important factor driving scheme design. Paragraph 6.1.69 of APP-085 refers to the Holford and Horlock Rules "alongside an iterative design approach informed by the EIA". The GAAC is aware of one scheme modification relating to Thurrock Airfield, where it was recognised in 2025 that adjustments to pylon height would be needed. The GAAC is unaware of any other iterative design approach relating to airfields. No alternatives to address the concerns of aerodromes were discussed. Aviation was not addressed until after the route was determined and design was well advanced. The scheme has been driven by engineering design, and other material considerations have not been accorded adequate weight. In respect of the mitigation hierarchy defined in EN-1 as: "A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity"	within paragraph **15.2.3 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]**. Paragraphs 5.5.8 to 5.5.9 of EN-1 (2024) describe differing safeguarding systems (in terms of regulation and oversight) to protect aviation safety, determined according to an aerodrome's relative national importance. Unlicensed General Aviation (GA) aerodromes (in comparison to Officially Safeguarded or licensed aerodromes) are not required to have a safeguarding system in place, reflecting their lesser importance in policy terms. For GA aerodromes, responsibility for safeguarding lies with the operator (EN-1 (2024) paragraph 5.5.16). The Applicant has consulted the operators of those GA aerodromes identified within the Aviation Impact Study Area in preparing its assessment of aviation impacts, in accordance with EN-1 (2024) paragraph 5.5.39. Paragraph 15.3.13 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]** further describes this operator engagement and its focus on understanding safeguarding concerns to inform development of the Project's design, as well as confirming the acceptability of the design and/or agreeing reasonable alternative or additional impact mitigation measures. Feedback from General Aviation stakeholder engagement, as well as the Applicant's aviation impact assessments, has directly informed development of the Project design. This is evidenced within the Design Development Report. Significant design changes were implemented where determined to be justified by potential aviation impacts as per the examples of Brook Farm airfield (see paragraphs 5.4.43 to 5.4.44 of **7.21 2024 - Design Development Report for the Project [APP-359]** and 5.1.1 to 5.1.3 of **5.1.5 Design Development Report [APP-122]**), Raydon Wings aerodrome (see paragraphs 5.4.104 to 5.4.110 of **7.21 2024 - Design Development Report for the Project [APP-359]** and Thurrock aerodrome (see paragraphs 11.1.1 to 11.1.15 of **5.1.5 Design Development Report [APP-122]**). The Applicant has presented its assessment conclusions to aerodrome operators, several of whom have concurred with the conclusions and agreed that the Project is

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			aviation impacts have not been properly addressed or mitigated. There has been no attempt at Tibenham, Priory Farm, Raydon Wings, or Chase Farm to avoid, reduce, mitigate, or compensate. The Applicant's Review of Aviation Impact (APP-267) sets out a series of "Specific Aerodrome Assessment Conclusions". For each affected aerodrome, factual information and generated performance data are provided. We comment as follows: • The methodology applied to determine the criteria has not been explained or described. • There is an implicit assumption that unlicensed aerodromes are of less importance than those licensed by the CAA. This position was clearly expressed by National Grid and its aviation advisers at a small number of short meetings. • Site-specific activities, environment and geographic location have not been considered. The CAA Airfield Advisory Team (AAT) advised National Grid in March 2025: "From our earliest engagement, we have provided a 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." CAA advice to General Aviation aerodromes has not been applied. The CAA considers the Aerodrome Operator of licensed aerodromes to hold the *expert opinion*. It does not hold a view on unlicensed sites. However, the CAA Combined Aerodrome Safety Team (CAST) has issued publications applicable to all aerodromes, recommending that the provisions of CAP 738 are applied and that all aerodromes lodge safeguarding plans with their local planning authority. The aerodromes at Tibenham, Priory Farm, Raydon Wings, and Chase Farm are well-established sites providing flying training, recreation, and leisure activities. The operators of these aerodromes, as aviation experts with many years of experience, consider that the proximity of the pylon route and ancillary infrastructure would cause material threats to aviation safety, in conflict with EN-1. The aerodrome operators, site safety officers, instructors and experienced aviators all have intimate knowledge of their sites. It is irrational not to treat these individuals as having the same expert opinion as defined in CAP 738.	acceptable in terms of assessed aviation safety impacts (for example, as described within **5.9.22 Signed Statement of Common Ground – Barnards Farm Airfield [REP1-050]**). The examples of Brook Farm and Thurrock aerodromes and South Norfolk Model Flying Club demonstrate where risk tolerability has been agreed following the Applicant's implementation of appropriate changes to the Project design to minimise adverse safety and operational impacts, in accordance with EN-1 requirements (see **5.9.32 Signed Statement of Common Ground – Brook Farm aerodrome [REP1-060]**, **5.9.23 Draft Statement of Common Ground – Thurrock Airfield (Revision C)** and **8.3.34 Signed Statement of Common Ground – South Norfolk Model Flying Club (Revision B)**. In instances where operators are yet to agree with the Applicant's conclusions that risks are acceptable, we suggest there remains opportunity for further collaborative review involving the consideration of reasonable mitigation measures and the operator's acceptance of any residual risk. In only one instance (the case of Chase Farm) have the Applicant and the operator agreed that loss of operational function would occur unless major mitigation measures are implemented. The operator is considering whether the proposed mitigations (to realign or relocate the aerodrome runway) are practical or viable and if residual risk can be accepted. If the operator takes the view not to apply mitigation measures and that the aerodrome is not safe, they would take the decision to cease operating, so there would be no public safety issue(see **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [Revision B]**. The Applicant position is that there is no human health or public safety implication arising from impacts on GA aerodromes as no unacceptable risks following mitigation are assessed. If, notwithstanding this, the GA operator of an unlicensed aerodrome decided to close the aerodrome on perceived safety grounds, this loss would be considered within the planning balance but would generally not be weighted as heavily as for an officially safeguarded or licensed aerodrome and would not disrupt the CNP presumption. The cascade test described in EN-1 (2024) paragraph 5.5.59 would not be satisfied, nor would the physical safety risk remain (paragraph 5.5.60). **8.5.7. Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2** also refers.

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			The CAA's CAP 793 provides safe operating practices for unlicensed sites, including identification and risk management. There is widespread misunderstanding, applied by National Grid, that unlicensed aerodromes are in some way less important than licensed sites. The key distinction between licensed and unlicensed aerodromes is that training at an unlicensed site may only occur with aircraft having a maximum take-off weight of 2,730 kg. Responsibility for safety rests with flying instructors and aerodrome operators, who are the experts on their sites, surroundings, constraints, microclimate and operational skills. Most flying training now takes place in microlight aircraft, which operate from unlicensed aerodromes. Operators of unlicensed aerodromes must take as much care and responsibility for safety as those at licensed aerodromes. The Air Navigation Order 2016 applies to all aerodromes. Article 240 makes it a criminal offence to recklessly or negligently endanger an aircraft or any person therein. In summary, aviation risk and safety were not addressed at the start of the project design. When National Grid began to address this in 2024, the position taken was that public safety at unlicensed aerodromes did not carry the same weight as at licensed sites. Affected aerodromes sought constructive engagement with National Grid to examine mitigation; this was not reciprocated. Additional risks to aviation safety clearly arise from new tall structures and, in this case, a continuous overhead cable in close proximity to aerodromes. The responsible persons at each affected aerodrome have presented their own analysis of risk, based on operations and site-specific knowledge. These risks fall within the scope of EN-1 paragraph 4.1.7. The GAAC does not consider that the need case outweighs the residual effects. Residual effects could constitute an unacceptable risk to human health and public safety. The ALARP (As Low As Reasonably Practicable) principle, recognised by the Health and Safety Executive and the CAA, has not been demonstrated as having been applied by National Grid. The adverse aviation impacts inherent in the scheme under examination could have been addressed at an early stage. Relatively minor route adjustments could have avoided the risks to aviation safety that this scheme generates. In conclusion, while the scheme is of Critical National Priority, the need case does not outweigh unacceptable	The Respondent's comments relating to the Applicant's aviation impact assessment methodology and consultation approach have been addressed within **8.4.8 Applicant's Comment on any Further Information or Submissions Received by Deadline 2 [REP3-070]**, (pages 153 to 181).

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			negative residual effects constituting an unacceptable risk to human health and public safety. These effects must be taken into account and require modification of the scheme to remove unacceptable risk and interference to public safety.	
			Ardleigh Parish Council and Little Bromley Parish Council The Parish Councils do not dispute that the Proposed Development falls within the category of infrastructure identified as Critical National Priority ("CNP") under EN-1 However, properly understood, CNP establishes the national need for the category of infrastructure in question. It does not: a. determine the appropriate location of such infrastructure; and/or b. justify the concentration of multiple major infrastructure projects within a single locality. Create a presumption in favour of any particular technological, locational, or configuration-based solution advanced by an applicant. Its scope is confined to the infrastructure type, not the means by which an applicant proposes to deliver it. EN-1 makes clear that, notwithstanding CNP, decision-makers must still: a. Assess site-specific impacts, consistent with the general assessment principles in EN-1 §4.1 (see also §§4.1.5-4.1.7; §4.3.18-4.3.19); b. Consider whether the proposal represents a rational and appropriate siting and in doing so consider alternatives (§4.2.23); and c. Have regard to the principles of good design and system resilience (including EN-1 §§4.1.7, 4.1.17, 4.7.10-4.7.14). These requirements continue to apply notwithstanding the CNP presumption, which only applies after the proper application of the mitigation hierarchy and meaningful consideration of alternatives. The Applicant's Deadline 2 submissions confirm that it relies on CNP to outweigh identified residual harms. In particular, Document 8.4.1 (Rev B) indicates that 3 residual environmental effects are said to fall within the category of development where the CNP presumption applies and outweighs those effects (see page 50). That approach omits the critical distinction between: a. the existence of a need for this category of infrastructure, and b. the appropriateness of the Applicant's chosen location, technology, configuration and concentration of assets. EN-1 does not "collapse" these questions into a single question. The proper application of policy requires a prior question to be addressed, namely whether the ALBA is an appropriate location for the concentration of the	The Applicant welcomes the acknowledgement that the Project is CNP infrastructure. With regard to the role of CNP policy, NPS EN-1 is clear at Paragraph 4.2.7 that '*The CNP policy* ***does not*** *create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure.* ***The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State****'.* Paragraph 4.2.8 '*During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2*.' Paragraph 4.2.10 sets out that applicants for CNP infrastructure must continue to show how their application meets the requirements in NPS EN-1 and NPS EN-5, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. The technical need case for the reinforcement of the East Anglia and South East Transmission System is fully set out in the **7.17 Strategic Options Backcheck and Review [APP-355]**. The adopted design approach is set out within **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application. The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. The

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			infrastructure proposed1. That question has not been properly examined. In particular, the Applicant has not demonstrated: a. That the concentration of multiple substations and associated infrastructure within the ALBA represents a rational or resilient configuration as anticipated by EN-1; b. That reasonable alternative configurations or locations (including alternative technologies such as onshore of offshore HVDC, undergrounding or routing using existing corridors) would not materially reduce the identified harms, as required under EN- where alternatives come to bear on planning judgement; or c. That the cumulative effects arising from such concentration have been properly taken into account in the siting of the development. This deficiency is compounded by the Applicant's persistent failure to articulate clear Project Objectives, against which any alternatives assessment can be meaningfully undertaken. Without transparent and defined objectives, the Applicant's assertions that alternatives "cannot meet the objectives" are untestable, 1 See EN-1 (2025 edition) at Section 2 and Section 4 4 and the alternatives appraisal becomes an exercise in post hoc rationalisation rather than a genuine policy-compliant evaluation. This is a significant procedural defect. The reliance on CNP to outweigh harm therefore risks treating national need as determinative not only of whether development should be permitted, but also where and how it should be delivered. This is not supported by EN-1 and elevates the presumption beyond that which was clearly intended. The Examining Authority is therefore invited to approach the application on the basis that CNP does not displace the need for a rigorous assessment of location, alternatives, cumulative effects, and system resilience, all of which remain in issue in the present case. The Parish Councils await with interest the comments to be made by the local authorities and the statutory consultees in respect of the policy tests identified by the ExA.	key stages and their relationship to the alternatives assessment were: • April 2022: **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** identifying preferred strategic proposal to meet the defined need and corridor options • April–June 2022: Non-statutory consultation on preferred corridor options and graduated swathes for the Project. See **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** published at the 2022 non-statutory consultation • June 2023: **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** validating strategic approach • June 2023: **7.20 2023 - Design Development Report for the Project [APP-358]** documenting design changes considered following 2022 consultation feedback • June-August 2023: Non-statutory consultation on 2023 preferred draft alignment with proposed infrastructure locations • April 2024: Updated Strategic Options Backcheck and Review (National Grid, 2024) validating strategic approach • April 2024: **7.21 2024 - Design Development Report for the Project [APP-359]** documenting design changes considered following 2023 consultation feedback • April-July 2024: Statutory consultation on 2024 preferred draft alignment with Preliminary Environmental Information Report • March 2025: Targeted statutory and non-statutory consultation on proposed changes following statutory consultation including change to Tilbury connection arrangements • uly 2025: **5.15 Design Development Report [APP-122]** issued with DCO application to report on the feedback received to the 2024 statutory consultation and to the targeted statutory and non statutory consultations held in 2025. This timeline demonstrates how the strategic work identified the Project and how alternatives assessment evolved through iterative design development of the Project, with each Project consultation document building upon previous assessments and incorporating stakeholder feedback. The wider strategic framework for the Project was reviewed via the Strategic Options

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
				Backcheck and Review to ensure need case is met. The documents listed above provide the detailed technical evidence base that underpins the alternatives, routeing and site selection assessment that has been undertaken as part of the design evolution for the Project. With regard to the concentration of multiple major infrastructure projects within a single locality, **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**, as updated by **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**, has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** by competent and professional experts. Inter-project cumulative effects with Five Estuaries and North Falls are considered in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**. The Landscape and Visual Impact Assessment included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** considers the effects of all aspects of the Project, as set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**.
				With regard to the Parish Council's comment that the classification of the Project as CNP infrastructure does not '*create a presumption in favour of any particular technological, locational, or configuration-based solution advanced by an applicant, and that its scope is confined to the infrastructure type, not the means by which an applicant proposes to deliver it'*, This matter is afforded consideration in the Opinion provided by Russell Harris KC **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1.** Paragraph 2.9.20 of EN-5 states that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.

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				In defining the Project design, the Holford and Horlock Rules were applied alongside an iterative design process informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. **6.18 Environmental Statement Chapter 18 – Summary [APP-287]** identifies which environmental topics have significant residual effects following the application of mitigation measures. As stated in **5.6 Planning Statement [APP-085]**, although the Project constitutes CNP infrastructure, this does not mean that it is subject to any less stringent obligations to mitigate impacts through the full application of the mitigation hierarchy. CNP policy applies only to residual, non-Habitats Regulations impacts where the urgent need for CNP infrastructure, together with other benefits, will generally support grant of permission because it outweighs those residual impacts (unless exceptions apply). In deciding the Application in accordance with Section 104(3) of the Planning Act 2008, the Secretary of State must be satisfied that '*the adverse impacts of the proposed development would outweigh its benefits*' (Section 104(7)). To determine this, a balance of the Project's adverse impacts against its benefits must be carried out. The overall planning balance is presented in **5.6 Planning Statement [APP-085]** which concludes that the Project is in accordance with NPS EN-1, NPS EN-3 and NPS EN-5. Paragraph 4.1.3 of NPS EN-1 sets out a presumption in favour of granting consent for energy NSIPs. There is also a presumption that the urgent need for CNP infrastructure, such as the Project, will '*in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy'* (paragraph 3.3.63). The Project will help meet the urgent need for CNP infrastructure to meet '*energy objectives, together with the national security, economic, commercial, and net zero benefits'* (Paragraph 3.3.63 of NPS EN-1).

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
GEN 1.8	The applicant	**Community benefit** The DESNZ guidance Community Funds for Transmission Infrastructure was updated in November 2025. It sets out the government's expectation for how communities that live near onshore electricity transmission infrastructure should benefit from the development of this infrastructure, with the use of community funds. The government through this document makes clear that it expects engagement with communities at an early stage. The applicant is asked to summarise any progress made in engagement with this process and its plans in progressing community funds in the future.	**Essex County Council** ECC can confirm that the Applicant has yet to set out its approach to a package of Community Benefits in line with the Governments published guidance.	The Applicant outlined its planned approach for a community funds package in the response to the same question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. This response outlined a planned consultation on community funds, followed by the development of a community funds programme to address the key themes and priorities identified.
GEN 1.9	Lower Thames Crossing Project Port of Tilbury London Limited Sheringham Shoal and Dudgeon Extensions Projco Limited Five Estuaries Offshore Wind Farm North Falls Offshore Wind Farm Longfield Solar Energy Farm Limited EcoPower Suffolk Limited Brickkiln Farm Solar Limited Crouch Solar Farm Limited Eden Renewables Innova Renewables Limited (Hall Farm BESS and Parkgate Solar Farm) Crest Nicholson Conrad Energy Pivoted Power Ingrebourne	**Report on interrelationship with other infrastructure projects** A report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 **[REP1-134]**. The applicants/ developers of the projects listed in table 2.1 of the report (those which are IPs in this examination) are asked to provide comments on the content of the report, cross referencing to any relevant statements of common ground (SoCG) where necessary.	**Aura Power Developments Ltd** *[Note: it is not identified in REP3-166 explicitly which ExQ1 question the submission is responding to, however it is assumed by the Applicant to be most relevant to this question and is therefore provided here].* 2.1. Aura Power submitted Written Representations to the ExA on 26th February 2026 ahead of Deadline 1 confirming that the Norwich to Tilbury Project's (Pylon Project) current plans will have a material impact on the Solar Project, its underground cable route, and its proposed areas for BNG and ecological mitigation. 2.2 The Applicant has provided comment on the interrelationship between the Pylon Project and the Solar Project via ExQ1 section GEN 1.12 and the linked interrelationship report REP1-134. 2.3 Section 3.3.8 (BMS44 & BMS69) within REP1-134 surmises that "The proposed solar farm planning application (DC/23/05426) area covers an area of 49.1 hectares of which 13 hectares would be covered by solar panels", and that "As there is no physical overlap of built development, the proposed development is currently not considered to impact on the ability of the Applicant or the developer to implement their respective proposals." Aura Power responds for the record that the Applicant's statement referred to in 2.3 above is factually incorrect as the consented layout plan GBR.0010.DEV.M4.001.0.D.h contains an area of approx. 26.38 hectares covered by solar panels. Aura Power provides Figure 3 below which overlays the relevant parts of the Pylon Project's proposed permanent built development, temporary development such as the construction haul road, and overall order limits for wider	The Applicant met with Aura Power Developments Ltd on 28 April 2026. Matters discussed included the Project's interactions with the developer's ecological areas and the route of the temporary access track. The Applicant has made some amendments to Section 3.3 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** to reflect the points made in Aura Power Developments Ltd.'s submission.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
	Valley Ltd Sewells Reservoir Construction (SRC) Group Limited		rights of access on top of the Solar Project's consented layout plan GBR.0010.DEV.M4.001.0.D.h. Aura Power responds that the Applicant's statement referred to in 2.3 above is incorrect as the permanent built development (Pylon RG91) proposed within the area of the layout plan identified as 'Wildflower Planting with Skylark Mitigation' will have a material impact on Aura Power's ability to deliver on its obligations within the Solar Project's planning consent regarding biodiversity net gain and skylark mitigation via skylark plots in this area as well as the adjacent area identified on the layout plan as 'Retained Agricultural Land with Skylark Mitigation'. Tall structures such as pylons and overhead lines act as perches for skylark predators thereby discouraging skylarks to nest and breed nearby, therefore if Pylon RG91 is constructed in the location currently planned there could be a subsequent requirement from the local planning authority on Aura Power and the Landowner to secure alternative land for skylark mitigation. The obligation for Aura Power to deliver skylark plots in the areas identified in 3.3 above is secured legally with Mid Suffolk District Council via a signed Section 106 Agreement dated 8th August 2025. Aura Power responds that the Applicant has not acknowledged the Written Representations submitted by Aura Power confirming that temporary rights proposed by the Pylon Project including, but not limited to, the compulsory acquisition of rights for the construction of a "Primary Access Route" that is understood to be an approx. 20 metre wide temporary construction haul road, together with temporary access for scaffold installation and a crossover bellmouth access point off Millway Lane with visibility splay (black and blue hatched areas in Figure 3), as well as the compulsory acquisition of rights for undergrounding of an existing 11kV overhead line within proximity of proposed pylon RG92 (yellow hatched area in Figure 3), will all have a material impact on Solar Project. Aura Power responds that the non-built development (or temporary rights) noted in 3.5 above are clearly shown in Figure 3 [*see REP3-116 for figure]* to overlap and therefore have direct interaction and a material impact on the following areas of the Solar Project: • Additional negative impact on Aura Power's ability to deliver on its obligations within the Solar Project's planning consent regarding biodiversity net gain and skylark mitigation via skylark plots in the area of the	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			layout plan identified as 'Wildflower Planting with Skylark Mitigation'. • Impacting a section of the new vegetation Aura Power are obliged to plant, identified on the layout plan in lime green as 'Proposed New 10m Tree Belt' and 'Proposed New Hedgerows With Scattered Trees (4m buffer)'. • Impacting sections of the perimeter Fence identified by the purple line on the layout plan. • Impacting an area of solar panels (PV Rack) in the north east corner of the layout plan. • Impacting the substation (DNO + Substation identified by an orange polygon) and the nearby Transformer station identified in grey. Compensation for Loss or Damage: Where DCO powers to acquire land and rights in land compulsorily are exercised, any loss or damage caused to landowners, occupiers and those with another interest in land by the exercise of the powers is compensable. Should land that Aura Power has rights over be affected (either temporarily or permanently) by the Pylon Project, Aura Power outlines its position that it will be entitled to compensation for all costs and loss of revenue related to any land taken and any impact the Pylon Project has on the Solar Project and its underground cable route. This compensation will need to recognise that following the grant of planning permission, alongside work to discharge planning conditions in 2026 and work to commence construction in 2027 and beyond, the Solar Project is committed development. Compensation would include, but not be limited to: • Land/Rights acquisition cost • Loss of development value • Disturbance • Injurious affection • Severance • Legal and professional fees • Statutory Loss payments • Summary of Aura Power's Response. Aura Power rejects the Applicant's statement that "As there is no physical overlap of built development, the proposed development is currently not considered to impact on the ability of the Applicant or the developer to implement their respective proposals." for the reasons outlined in sections 3.3 - 3.6 above which demonstrate that both the temporary and permanent built	

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			developments shown in Figure 3 will have a material impact on the Solar Project. Aura Power objects to the location of the proposed Pylon Project temporary and permanent development shown in Figure 3 as they will not provide best value for money for consumers and UK taxpayers who will ultimately have to fund an avoidable significant additional cost in the form of consequential compensation that would become payable to Aura Power to reflect the impact of incurred costs and lost revenue for the Solar Project.	
			Equinor New Energy Limited on behalf of Sheringham Shoal and Dudgeon Extensions ProjCo Limited	The Applicant has updated Section 3.2 and Table 6.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** taking into account Equinor New Energy Limited's comments. The Applicant notes the interaction between the permanent access and the environmental area as reported in **8.3.10 Draft Statement of Common Ground - Equinor [REP1-081]**. We are currently in discussion with our landscape team to understand the impacts this will have on the Environmental Area and will provide an update at Deadline 5.

NGET Submission	SSDEPL Clarification
3.2.2 The projects are promoted by Equinor. Development consent was granted in April 2024.	As set out in full in REP1-231, the application was promoted by Equinor New Energy Limited on behalf of Sheringham Shoal and Dudgeon Extensions ProjCo Limited (SSDEPL) but SSDEPL is the undertaker for the purposes of the Sheringham Shoal and Dudgeon Extensions DCO.
There is an overlap with the Order Limits for the Project in the vicinity of Hall Green Cottages and Vale Farm.	There are multiple points of overlap/interaction between the Order Limits for the projects. These are described in full in the above written submissions and the Statement of Common Ground (REP1-081).
A crossing agreement is needed due to the Project's oversail of Equinor's cable corridors and haul roads. A SoCG is in preparation with an update due to the ExA for Deadline 1.	SSDEPL's solicitors noted the reference in REP1-134 to the need for a crossing agreement and raised a query on this with NGET, as SSDEPL had not requested such an agreement and this was the first mention of one being required. SSDEPL awaits a response on this. SSDEPL is engaging directly with NGET to ensure

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person		Applicant's Comment
				SSDEPL's concerns are addressed in suitable protective provisions to be included within the draft Development Consent Order.	
			Table 6.1 – DCO6 Mitigation and screening planting proposed along the boundaries of the parcels of land immediately surrounding the proposal's onshore substation site – located south of Norwich Main Substation. Planting will comprise enhanced hedgerow and proposed native tree, scrub and grassland planting with habitat creation. Interaction – The Project interacts with land earmarked for the proposal's 400 kV cable easement and does not interact with the proposal's mitigation and screening planting.	SSDEPL has identified interactions in relation to landscape and ecology mitigation beyond those listed in Table 6.1. There are, therefore, further interactions which will have significant impacts on SSDEPL's ability to fulfil its own landscape and ecological management obligations as secured through the requirements of the Sheringham Shoal and Dudgeon Extensions DCO. SSDEPL has, in considering Row DCO6 of Table 6.1 (REP1-134), noted further discrepancies and issues with documents submitted by the Applicant. SSDEPL has noted a discrepancy between the detail of the landscaping shown on the Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals (APP-325) and the Trees and Hedgerows to be Removed and or Managed Plans – Section A (APP-048). APP-048 indicates tree groups and hedgerows within this area are to be removed. APP-325 indicates this area as "Existing Vegetation to be managed under overhead lines" indicating it will be retained. Table 6.1 does not acknowledge that this proposed planting directly overlaps with areas where the Sheringham Shoal and Dudgeon Extensions DCO consents permanent works,	

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				including operational access, landscaping, ecological, environmental and drainage works, resulting in a direct conflict. This concern relates to the area shown on APP-325 where there is new planting proposed on the eastern side and southeastern corner of the existing Norwich Main Substation. NGET has confirmed in REP1-081, within the Table at Paragraph 6, row 6.3 that "National Grid can commit to planting environmental areas in such a manner that would not obstruct the SSDE permanent access road to its substation". It will also be important for SSDEPL to be able to freely access the landscape and mitigation planting undertaken in respect of the Sheringham Shoal and Dudgeon Extensions DCO in order to comply with its maintenance obligations within the requirements of that DCO. SSDEPL welcomes the commitments made in REP1-081 and looks forward to seeing in greater detail how NGET will deliver this commitment to ensure these direct conflicts can be resolved.	
			Five Estuaries Offshore Wind Farm Limited Five Estuaries confirm that the interrelationship report through the appendices (e.g. Appendix B1 Tripartite Position Statement or **8.4.3 Report on Interrelationship with Other Infrastructure Projects (Final Issue A) [REP1-134]**) adequately sets out the position on coordination between the projects. Five Estuaries note that appendix B.2 Onshore substations operational noise and the outline noise complaints protocol requires some minor amendments. This is currently under discussion between Five Estuaries and the Applicant. Five Estuaries		The Applicant has discussed amendments to the Onshore substations operational noise and the outline noise complaints protocol with Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm to agree an updated version of the protocol. This updated version has been included as Appendix B.2 to **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**, submitted at Deadline 4.

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			understands that the Applicant plan to submit an updated version at Deadline 4 as a result of this ongoing engagement to address this.	
			National Highways Lower Thames Crossing Project NH LTC has previously commented on the Applicant's Interrelationship document [REP1-134] and refers the ExA to those comments in section 4 of NH LTC's response to Deadline 2 [REP2-052]. Whilst NH LTC recognises that there has been progress in discussions with the Applicant, it is of the view that further substantive engagement is still necessary in order to ensure that NH LTC can appropriately assess the impact. Its position therefore remains as per its Statement of Common Ground with the Applicant.	The Applicant considers that **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [Revision B]**, as signposted by **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**, is the appropriate location to address the detail of Lower Thames Crossing's comments. However, reflecting on Lower Thames Crossing's **Comments on any further information or submissions received by deadline 1 [REP2-052]**, the Applicant has updated section 3.2 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** to include a table showing the temporal interface between the Project and Lower Thames Crossing construction stages. As section 1.2 and now section 3.1 of this report clarifies, it does not aim to replicate the detailed information and conclusions in Chapter 17 of the Environmental Statement. Pages 10 – 15 of **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**, as updated by **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**, already presented the assessment of inter-project cumulative effects between the Project and Lower Thames Crossing. The Applicant's cumulative effects assessment documents, **7.11 Transport Assessment [APP-333]**, **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]** and **7.2 Outline Code of Construction Practice [Revision D]** are already signposted in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**.
			Pace Nano Energy Limited PACE Nano Energy Limited (company number 12645785) (PACE Nano) is a wholly owned subsidiary of Egg Power AssetCo Limited (company number 16485175) (Egg Power) which is a well-established renewable energy investment company. Further to PACE Nano's Relevant Representation [RR-2789] and Written Representation **[REP1-264]** PACE Nano affirms that it does not have an in-principle objection to National Grid Electricity Transmission's (NGET) application for a Development Consent Order (DCO) for the proposed Norwich to Tilbury project (Proposed Development) but would like to reserve its position in the examination until the interface between the projects is settled commercially.	The Applicant has updated Section 3.3 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** taking into account Pace Nano Energy Limited's comments. Please also refer to **8.3.23 Draft Statement of Common Ground - Pace Nano Energy (Grange Farm Solar) [Revision B]** for a record of the areas of agreement and discussion between the Applicant and Pace Nano Energy Limited.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			PACE submits this representation in response to the Examining Authority's First Written Questions (ExQ1) [PD 014] issued on 20 March 2026. PACE Nano refers to ExQ1 reference GEN 1.9 which requests developers of the projects listed in in Table 2.1 of the Interrelationship Report submitted by NGET (the Applicant) at Deadline 1 **[REP1-134]** who are interested parties in this examination to provide comment on the content of the report, cross referencing to any relevant statements of common ground (SoCG) where necessary. A response is to be provided by Deadline 3 (10 April 2026). As requested in its Written Representation **[REP1-264]**, PACE Nano's interest has been recognised in the Interface Report [REP1-134] as ID reference BMS63 in Table 2.1 of the report. The report accurately reflects that PACE Nano holds a planning permission for Grange Solar Farm (Ref: DC/22/02667). The entry refers to an indicative construction phase of October 2025 – October 2026, with an expected operational start date of 2026. PACE Nano confirms this is accurate, with the development currently in its construction phase and with an anticipated operational date of December 2026. The report expands upon PACE Nano's interest at paragraphs 3.3.10 to 3.3.13 under the heading 'PS Renewables / PACE Nano Energy Limited – Grange Solar Farm – Grange Farm Old Bury Road Palgrave Suffolk IP22 1AZ (BMS63)'. PACE Nano notes that it is no longer a subsidiary of PS Renewables, but rather of Egg Power. PACE Nano otherwise confirms that the negotiations between the parties are progressing constructively. The parties have agreed Head of Terms and are in the process of negotiating a commercial agreement to manage the interface. This includes provision of the design modifications referred to in paragraph 3.3.13 to modify and underground an existing overhead line, and for PACE Nano to facilitate alternative access rights for NGET to certain NGET towers. PACE Nano confirms that the position above is reflected in the parties' SoCG, a draft of which was submitted at Deadline 1 [REP1-093]. The parties will continue to keep the SoCG updated as negotiations in respect of the commercial agreement progress. PACE Nano notes a mid-examination update is required with respect to the Interrelationship Report and SoCG by Deadline 4 which is 12 May 2026 and will continue to progress the position with the Applicant in advance of this date.	

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			Port of Tilbury London Limited Port of Tilbury London Limited (PoTLL) has reviewed the Report on Interrelationship with Other Infrastructure Projects **[REP1-134]** (the Report). Project ID DCO4 relates to the expansion of the Port of Tilbury, known as Tilbury2, which was authorised by The Port of Tilbury (Expansion) Order 2019 (the Tilbury2 Order). PoTLL is satisfied that the Report accurately reflects the relationship between the Norwich to Tilbury proposals and Tilbury2, including that the changes made to the Norwich to Tilbury proposals following statutory consultation removed any interface with the Port of Tilbury and the freeport. PoTLL has also considered the Report in relation to further proposed expansion of the Port of Tilbury, known as Tilbury3. Tilbury3 is not referred to within the Report. Tilbury3 is given Project ID TH38 in **Appendix 17.2 Long List and Short List of Other Developments [APP-283]**. The planning reference number of 24/01023/SCO is in relation to PoTLL's request for a scoping opinion, being the available planning information at the Applicant's cut-off date of 1 April 2025. The application for planning permission (hybrid) for Tilbury3 was submitted on 14 May 2025, and Thurrock Council made a resolution to grant planning permission on 25 February 2026. The Tilbury3 application has planning reference 25/00598/FUL. In reviewing ES Appendix 17.3 – Inter-project Cumulative Effects [APP-284], TH38 has been included, but erroneously refers to application reference 23/01502/FUL. This is the National Grid project for a new cable tunnel between Tilbury and Gravesend. Application reference 24/01023/SCO is not included in the assessment of Inter-project Cumulative Effects, despite being identified within the Long List and Short List as requiring a cumulative assessment. Within the Report, TH38 is referred to on PDF page 35, along with reference TH35, to refer to the National Grid cable tunnel between Tilbury and Gravesend. This error	The Applicant has submitted an updated report at Deadline 4 (**8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**), which uncouples TH38 (24/01023/SCO) and TH35 (23/01502/FUL). As a consequence there is a separate row in Table 2.1 of the report clearly identifying Tilbury3. The assessment for TH38 within **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** has been reviewed as part of a back check, further to the submission of the planning application, and the text relating to the description of the Tilbury3 development has been amended – see **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**; the assessment is included within an updated appendix to this document submitted at Deadline 4. Upon review, there are no changes required to the conclusions of the likely significant effects that had been reported for TH38, and the conclusions reported in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** for Tilbury3 remain valid.

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			of referencing has been repeated, but the omission of an assessment of Tilbury3 has not been identified. As a result, Tilbury3 is not listed in Table 2.1, and the information as to its status and indicative construction and operation programmes is not included. PoTLL requests that Table 2.1 is updated to list Tilbury3 correctly under ID TH38, and that Tilbury3 is not conflated with ID TH35 which is an unrelated project. We would also request that the Applicant is requested to undertake a back check and verify and confirm that this is a notation error and not reflective of an assessment error. In respect of the Tilbury3 project, PoTLL considered in the context of the assessment supporting its planning application the potential for cumulative effects with the Norwich to Tilbury proposals. In light of the distance between the projects, including in relation to the location of Norwich to Tilbury construction compounds, no cumulative effects were anticipated. To the extent that the Norwich to Tilbury proposals might seek to utilise the Port of Tilbury for deliveries, these would be within the traffic movements associated with the day to-day functioning of the Port. Accordingly, PoTLL is satisfied that subject to the above error being checked, rectified as appropriate and the basis of assessment confirmed, the Report does not need to make any further or specific reference to Tilbury3.	
GEN 1.13	The applicant Pivoted Power LLP	**BESS at Norwich Main Substation** ES chapter 4 (project description) design scenario 1 (Norwich Main substation section A) **[APP-130]** refers to the limits of deviation and order limits being widened in this location 'to allow flexibility to change the alignment should planning consent not be granted for a battery storage facility to the south of the substation', and notes that sensitivity testing has been carried out to allow an overhead line (OHL) alignment to be accommodated further east should the BESS not be granted. Could the applicant explain: • Which BESS and planning application is being referred to in the area to the south of Norwich Main substation? The interrelationship report **[REP1-134]** at paragraph 3.3.3 refers to a BESS in this area however the report and the SoCG with Pivoted Power **[REP1-094]** indicate that planning permission has been granted, with the RR from Pivoted Power LLP [RR-2963] referring to an electricity cable having been laid in 2025. Please clarify.	**Innova Renewables Limited** We write on behalf of Innova Renewables Limited in respect of the ExA's first written questions, particularly question GEN1.13. This is directed to Pivoted Power, albeit we consider this was meant to be directed at Innova. Innova has referred the ExA to the matter raised previously in its RR (27 November 2025), WR (REP1-243), at the first CAH and in post-hearing submissions (REP2-051). We continue to seek justification for the inclusion of the eastern swathe in the Order Limits (land parcel 1/3). To date no response has been provided to Innova by the Applicant despite the application having been submitted 8 months ago and the planning permission for Innova's Hall Farm BESS project having been granted in July 2025. Notwithstanding this, to recap again, planning permission was granted on 25th July 2025 for Innova's Battery Storage project at Hall Farm by South Norfolk Council under reference 2024/3750. That project is located south of Norwich Main substation and is located immediately	For a justification on the need to retain the eastern swathe in the Order Limits, refer to the Applicant's response to the same question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, as well as the Applicant's response to Innova Renewables Limited's Deadline 2 submission on pages 181 – 183 of **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**. To summarise, the Applicant is in ongoing engagement with Innova Renewables Limited to reach a mutually agreeable design in consideration of the Innova design having been amended from what was previously communicated to, and agreed with, the Applicant which stemmed from the significant engagement the Applicant has had with Innova since 2023. Therefore, the option to utilise the eastern corridor, within the current DCO Order Limits, may be one the Applicant seeks to investigate further if of benefit to either party pending the outcome of the ongoing attempts to agree a design solution.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
		• Why the widened order limits are necessary in this respect. Pivoted Power are asked to provide an update on the status of their project including timescales for construction.	beneath the 'eastern corridor' of the Applicant's proposed overhead line corridor south of the substation. A plan showing the area of this consented project was provided by Innova with its RR. As we understand it, there is a project owned by Pivoted Power nearby, on the opposite side of the rail line, that sits outside the order limits. Innova has sought clarification from the Applicant as to why the widened Order Limits are being sought in this location, crossing the consented BESS project. It seems clear from the application documents that the widened Order Limits were included to provide an alternative overhead line route in the event that planning permission was not granted for Innova's project (see the Applicant Design Development Report (APP-122)). Planning permission was, however, granted for Innova's project prior to the Applicant's DCO submission being submitted and the Applicant was well aware of Innova's design layout well in advance of consent being granted for the BESS. Innova's position is that the rights sought over the eastern corridor are not required, justified or reasonable and - given planning permission was granted for their project prior to the DCO application being submitted - CP powers should not have been included in the Applicant's DCO. To reiterate again, Innova's BESS project is over 100MW meaning Innova needs a generation licence to operate the project. This renders Innova a statutory undertaker under the Electricity Act 1989. By way of update, OFGEM granted a generation licence on 2 April 2026 to Innova's subsidiary called Hall Farm Solar BESS Limited and imposing rights over Innova's site is likely to cause serious detriment to its statutory undertaking. Innova would further like to note that the Applicant's Interrelationship Report (REP1-134) does not account for either of Innova's projects – the Hall Farm BESS or its Parkgate solar farm. Innova considers the report should be updated to reflect the interfaces with projects, explain its approach to resolving/managing issue and to assist the ExA's understanding of the impacts of the proposals on Innova's consented projects	Both Innova Renewables Limited's Hall Farm Battery Energy Storage System and its Parkgate solar farm were covered in Section 3.3 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, submitted at Deadline 1 (see pages 48 and 53), and continued to be covered in the updated report provided at Deadline 4 (**8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**). As requested by the ExA in **Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009]**, this report sets out the progress of other projects and interrelations in a '*simplified summary form*', with cross-referencing to sources of more detailed information including the Environmental Statement and Statements of Common Ground. Table 11.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**). signposts to the two Statements of Common Ground in negotiation with Innova Renewables Limited, where positions on detailed matters are set out.
GEN 1.17 All local authorities	**Local impact reports – cumulative developments and the interrelationship report** The LIRs from each local authority include details of other developments in their area to varying degrees of detail. Each local authority is asked to review ES chapter 17 (cumulative effects) appendix 17.2 (long list and short list of other developments) [APP-283] and	**Essex County Council** ECC has reviewed ES chapter 17 (cumulative effects) appendix 17.2 (long list and short list of other developments) (APP-283) in respect of Essex County Council and provides commentary as highlighted in Appendix A. ECC would also draw attention to the following application:	The Applicant has reviewed the additional applications raised by Essex County Council and an update is provided below: • ESS/57/04/TEN – This application is included within an updated inter-project cumulative effects assessment provided at Deadline 4.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
		figure 17.2 [APP-286], and confirm if the details provided by the applicant are accurate. Only those developments rated green in tables A17.2.2 to A17.2.14 (short listed developments) need to be checked. • All local authorities are asked to provide an update where relevant, which should include the current status of the application (whether and when consent has been granted and implemented). If any other major developments in your local authority area are not included, please provide details including planning reference, description, location, relevant dates, and current status (or development plan allocation details). Additionally a report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134]. • All local authorities are also asked to review the non-NSIP projects listed in section 3.3 and table 6.1 of the report and confirm if the application reference details are correct and that the applicant's summary of interactions between each project is reasonable, together with any other comments you wish to make on the report.	ESS/57/04/TEN – Crown Quarry Winning & Working of minerals, removal of surplus soils & erection of a low profile processing plant concrete batching plant & ancillary buildings (inc a workshop). Interim restoration to lakes & subsequent construct of a public water storage. Expiry – 17/07/28 Furthermore, ECC notes that National Grid have sought to include screening and scoping opinions for some projects, when actual planning applications have been submitted and approved for these developments. Additionally, the Applicant appears to have included some conditions discharges for some sites – a question is raised whether the extant permission reference should also be included. ECC is also recently aware of the Eastern Green Link 3 (EGL 3) and Eastern Green Link 4 (EGL 4) and Grimsby to Walpole proposal being promoted by NGET and due to be submitted later this year. ECC is unclear as to the relationship of this project with Norwich to Tilbury and whether it is dependent on Norwich to Tilbury receiving consent. ECC therefore requests that clarification on the relationship is provided by the Applicant.	These applications have been submitted since the cut-off date for the cumulative effects assessment (1 April 2025): • ESS/28/25/BTE (Appendix A) – Planning application relating to ID ECC35. • ESS/31/25/BTE (Appendix A) – Planning application relating to ID ECC6. • ESS/23/25/BTE (Appendix A) – Planning application relating to ID ECC39. The applications are included within our updated long list of other existing and/or approved developments which captures planning applications from 2 April 2025 to 31 January 2026, as provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4. However, no changes are required to the conclusions of potential inter-project cumulative effects with the other development previously reported in **Appendix 6.17.A3 Inter-Project Cumulative Effects Matrix [APP-284]**. The cumulative effects assessment methodology follows the approach presented in the Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects. The criteria used to determine the tier of development for the assessment, include consideration of screening and scoping reports. If developments have progressed since the 1 April 2025 cut-off date from the screening/scoping stage to submission of a planning application, these have been included within an updated inter-project cumulative effects assessment provided at Deadline 4. Where relevant, extant planning permissions have been considered and their references included in the update. National Grid projects Eastern Green Link 3 (EGL3), Eastern Green Link 4 (EGL4) and Grimsby to Walpole, are concerned with capacity in transmission system boundaries B6, B7, B8 and B9, whereas Section 3.8 of **7.17 Strategic Options Backcheck and Review [APP-355]** concludes that the Project's need case relates to capacity in other parts of the transmission system. Therefore, there is no direct connection/dependency between these other projects and Norwich to Tilbury, therefore EGL3 and EGL4 are independent of the Project, notwithstanding that all the projects relate to the same overall network.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Chelmsford City Council Cumulative developments: CCC has reviewed Appendix 17.2 (long list and short list) – Alt 172.2.10 and confirms that: CH2 • 20/00001/MAS Strategic Growth Site North Of Woodhouse Lane, Broomfield, Chelmsford, Essex Masterplan for around 450 new homes, neighbourhood centre, early years and childcare facility, local open space and associated access and highway infrastructure including a new access into Broomfield Hospital. CH3 • This was superseded by application 00/02064/OUT Strategic Growth Site North Of Woodhouse Lane, Broomfield, Chelmsford, Essex Outline application for residential development for up to 512 dwellings including affordable housing and custom build homes (Use Class C3), Local Centre (Use Classes E, F.1 and F.2), formal and informal open space, and associated infrastructure. All matters reserved except for primary access Comment: Application 26/00164/REM has been received and is under consideration for the reserved matters relating to the spine road. CH8 • 23/01583/FUL Strategic Growth Site 7A Moulsham Hall Lane Great L Fights Chelmsford Essex Hybrid planning application for EIA development to include: 1. Outline application with all matters reserved for residential development of up to 800 homes (Use Class C3), including affordable and self/custom-build homes; a Neighbourhood Centre comprising commercial, business and service (Use Class E) of which the anchor retail store is not more than 500sqm (GIA); medical services (Use Class E café), a children's nursery (Use Class E(f)) and a residential care home (Use Class C2) of up to 80 beds; a new primary school (Use Class F1); landscaping works, provision of strategic and local open space; biodiversity enhancements, all associated highways infrastructure, pedestrian, cycle, Public Right of Way (PRoW) and bridleway routes; drainage infrastructure and all associated ancillary works including services and utilities. 2. Full application for the principal means of vehicular access to the site, on site highways works, surface water attenuation basins and	Chelmsford City Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4. Details of mitigation planting can be found at Section 9.7 in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			associated ancillary works including services and utilities. Comment: The application remains under consideration. CH14 • 21/00881/FUL Broomfield Hospital Hospital Approach Broomfield Chelmsford CM1 7ET Formation of highway connection north of Woodhouse Lane, closure of sections of Woodhouse Lane, provision of turning heads north of Woodhouse Lane and connection to existing highway drainage. Comment: The decision was issued on 31/07/2025 subject to a S106 agreement. CH17 • 21/02050/CM Land North East Of Greater Beaulieu Park Beaulieu Parkway Chelmsford CNEB: A single carriageway road between Roundabout 4 of the Beaulieu Park RDR1 and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout. With one intermediate roundabout, 3 road overbridges and 1 pedestrian/cycle/horse overbridge. Together with other associated works and landscaping. Comment: The County Council granted planning permission for the proposal on 4th April 2022. The conditions relating to the application are being discharged by the County Council. CH20 • 21/02490/OUT Banters Field Main Road Great Leighs Chelmsford Essex Application for outline planning permission for the development of an integrated retirement community comprising up to 190 units (C2 use) with all matters reserved except for access. Comment: The application remains under consideration. CH22 • 24/00695/FUL Land South East Of Banters Lane Business Park Banters Lane Great Leighs Chelmsford Construction of 105 residential dwellings including affordable housing and custom build housing (Use Class C3) and principal means of site access, provision of resident's and visitor car parking, open space including children's play space, a new shared pedestrian/cycle route, enhancements to existing routes, hard and soft landscaping, highways works,	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			new drainage basin, and all associated infrastructure works Comment: The application remains under consideration. CH24 • 23/01751/OUT Zone 2 Chelmsford Garden Community Beaulieu Parkway Chelmsford Outline planning consent for a mixed use Garden Community to be delivered in severable phases with all matters reserved (save for where full details are submitted for a new access junction from Beaulieu Parkway - RDR1) for residential development; mixed use development comprising employment, commercial, retail, leisure, community and education facilities; specialist residential accommodation for the elderly; serviced land for a travelling show people site; green and blue infrastructure including a new Nature Park, public open space and sports facilities; sustainable transport infrastructure including two active travel bridges crossing CNEB; new highways including part of the Northern Radial Distributor Road (NRDR); utility and infrastructure work; site restoration and preparation works and demolition of structures; and associated and ancillary development Comment: The application remains under consideration. CH26 • 23/00124/OUT Zone 3 Chelmsford Garden Community Beaulieu Parkway Chelmsford Application for Hybrid planning permission at Powers Farm, Chelmsford; Outline Planning Permission with all matters reserved except means of accesses from/to the proposed NRDR. Residential development of up to 1250 units, which comprises market/affordable and single family rental (SFR) / Build to Rent (BTR). Provision of Discovery Park North which would include open space, landscaping, formal sports pitches, pavilion and associated car parking. Internal vehicular carriageways, footways, cycleways and all pedestrian routes with associated landscaping and green infrastructure. Phased development (each and every phase (and/or sub-phase) being a separate and severable part of the development. Detailed planning permission for two spine roads north/south carriageway(s), cycleway(s) and footway(s) from/to the proposed NRDR and one east/west spine road to Great Belsteads Village. Drainage and sustainable urban drainage systems (SUDs) throughout the development with all associated engineering works	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			including strategic ground reprofiling, stockpiling, and below ground works Comment: The application remains under consideration. CH28 • 21/01545/OUT Land North Of Warren House Roxwell Road Writtle Chelmsford Essex Outline application for Strategic Growth Site 2 comprising up to 880 new homes, primary school with co-located early years and childcare nursery, travelling showpersons site for five serviced plots, sports facilities including a pavilion/community centre, neighbourhood centre (including retail, community, healthcare, office and residential uses), plus associated landscaping and habitat creation, public open space and play facilities, roads and infrastructure (all matters reserved except access), together with a detailed scheme in the south east corner for Phase 1A comprising 311 no. houses plus associated roads, parking and infrastructure (Landscaping reserved for Phase 1A Comment: The application remains under consideration **Interrelationship with other projects:** **NSIP** Longfield Solar Farm (EN010118) 3.2.21 There is an overlap between the order limits of the Longfield Solar Farm and the Project at the northern extent of the solar farm site. The Applicant is proposing to modify an existing UK Power Networks PSB overhead line which will necessitate the creation of an access from Terling Hall Road, through Leylands Farm around the eastern edge of the site. It is not considered that the Project would materially impact on the function or use of the site CCC defers to Braintree District Council as the affected access extends through their administrative area. On non NSIP projects 3.3.30 Essex County Council - Chelmsford North East Bypass - Land North East of Greater Beaulieu Park Beaulieu Parkway Chelmsford (CH17 & ECC11), CCC confirms the application reference details are correct. CCC defers to Essex County Council regarding the Applicant's summary of interactions. On table 6.1, details of the mitigation planting should be provided within the detailed LEMP for further consideration / agreement upon the construction of the development.	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Brentwood Borough Council From the developments rated green in table A17.2.12, ID BR11 (Application Reference: 24/01263/FUL) has now been approved. Para 3.3.34 & 3.3.35 and Table 6.1 (BR2 & BR11) have been reviewed, reference details appear correct and interaction summary appears reasonable.	Brentwood Borough Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4.
			Norfolk County Council Table A17.2.2 of **[APP-286]** NCC1 FUL/2020/0078 No update – approved at time of submission No further relevant developments need to be added to the shortlist. Section 3.3 of **[REP1-134]** These projects are energy projects below the NSIP threshold. NCC therefore defers to South Norfolk District Council which, as the district planning authority, decides applications for this type of project. Table 6.1 of **[REP1-134]** These projects are energy projects below the NSIP threshold. NCC therefore defers to South Norfolk District Council which, as the district planning authority, decides applications for this type of project.	Noted.
			South Norfolk District Council SNDC advise that item DCO11 in Table A17.2.1 of document APP-283 is now at DCO pre-examination stage rather than pre-application. SNDC have the below updates to items already included in Table A17.2.1 of document APP-283. Item SN2 has been approved Item SN21 has been approved Item SN24 has been approved Item SN25 has been approved Item SN26 has been approved Item SN28 has been approved Item SN30 has incorrect application reference, should be 2024/3816 and this has been approved Item SN33 has been approved Item SN47 has been approved and is within the order limits.	The entry for East Pye Solar (DCO11) has been updated to note it now is in the pre-examination stage. South Norfolk District Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4. The Applicant has reviewed the additional applications raised by South Norfolk District Council and an update is provided below: • Planning application 2017/2794 and all related reserved matters have been considered within an updated long list of other developments provided at Deadline 4; the updated long list is an appendix of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**. This includes 2021/1034, 2021/1035, 2021/1036, 2021/1037, 2021/1038 and 2021/1039. The nature and scale of proposed development, and distance from the Project are not anticipated to give rise to

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			SNDC advise that the below applications have not been included and request that these are added to Table A17.2.1 of document APP-283. 2021/1034: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the second phase (Phase 2) of the development comprising the construction of Units 5-7 (Use Classes B2/B8) and ancillary development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 5-7 only), Condition 9 (Units 5-7 only) and Condition 23 (Units 5-7 only) of the outline planning permission. Approved with Conditions 2021/1035: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the third phase (Phase 3) of the development comprising the construction of Unit 2 - builders merchant (Use Class B8 plus ancillary trade counter) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Unit 2 only), Condition 9 (Unit 2 only) and Condition 23 (Unit 2 only) of the outline planning permission. Approved with Conditions 2021/1036: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the fourth phase (Phase 4) of the development comprising the construction of Units 8-10 (Use Classes B2/B8) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 8-10 only), Condition 9 (Units 8-10 only) and Condition 23 (Units 8-10 only) of the outline planning permission. Approved with Conditions 2021/1037: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the fifth phase (Phase 5) of the development comprising the construction of Units 3-4 (Use Classes B2/B8) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 3-4 only), Condition 9 (Units 3-4 only) and	cumulative effects, therefore the other development has not been shortlisted for assessment of inter-project cumulative effects • Planning application 2022/1344, 2022/1975 and 2022/1976 – The applications are considered within the updated long list of other developments provided at Deadline 4. The developments are unlikely to give rise to significant cumulative effects with the Project's effects, due to the development being operational before the Project begins construction; therefore, the other developments have not been shortlisted for assessment of inter-project cumulative effects • Planning application 2022/2350 and 2023/3574 – These applications have been included within the updated inter-project cumulative effects assessment provided at Deadline 4. • Planning application 2024/1734 is a variation of ID SN17 and planning application 2024/3786 is a variation of ID SN3. The applications have been included in the updated long list of other developments provided at Deadline 4. However, no changes are required to the conclusions of potential inter-project cumulative effects with the other development reported in **Appendix 6.17.A3 Inter-Project Cumulative Effects [APP-284]**. • Planning application 2024/2152 is a variation of ID A11 (SNC). The application has been considered within the updated long list of other developments provided at Deadline 4. The development is unlikely to give rise to significant cumulative effects with the Project due to the development being operational before the Project begins construction; therefore the other development has not been shortlisted for assessment of inter-project cumulative effects. • 2024/3817 has been considered within the updated long list of other developments provided at Deadline 4. The nature and scale of proposed development and distance from the Project are not anticipated to give rise to cumulative effects, therefore the other development has not been shortlisted for assessment of inter-project cumulative effects. Planning applications outside of the Zone of Influence for the cumulative effects assessment: • 2024/1245 • 2025/2930 • 2025/3957. These developments do not meet the criteria for assessment. The scale, nature and distance from the

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Condition 23 (Units 3-4 only) of the outline planning permission. Approved with Conditions 2021/1038: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the sixth phase (Phase 6) of the development comprising the construction of Units 9-14 (Use Class B1) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 9-14 only), Condition 9 (Units 9-14 only) and Condition 23 (Units 9-14 only) of the outline planning permission. Pending Consideration 2021/1039: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the seventh phase (Phase 7) of the development comprising the construction of Units 15 20 (Use Class B1) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 15-20 only), Condition 9 (Units 15-20 only) and Condition 23 (Units 15-20 only) of the outline planning permission. Pending Consideration 2022/1344: Land East of Vinces Road, Diss Residential development with associated access, landscaping, surface water attenuation and parking. Approved with Conditions 2022/1975: Land South of Rowden Way, Roydon Residential development with associated access and parking. Approved with Conditions 2022/1976: Land West of Denmark Lane, Roydon Residential development with associated access, parking, landscaping and associated infrastructure. Approved with Conditions 2022/2350: Ipswich Road, Dunston Installation of underground electrical connection and communication cables between Bloy's Grove Solar Farm and Norwich Main Substation, with Temporary Construction Compound and associated infrastructure. Application is accompanied by an environmental statement. Approved with Conditions	Project are not anticipated to give rise to significant cumulative effects. Planning applications that have been submitted since the cut-off date for the original cumulative effects assessment (1 April 2025) submitted with the Environmental Statement. These developments are included within our updated long list of other existing and/or approved developments which captures planning applications from 2 April 2025 to 31 January 2026. The developments have not been shortlisted for further assessment as the nature and scale of proposed development, and distance from the Project are not anticipated to give rise to cumulative effects. Planning application 2025/2275 has been submitted since the cut-off date for the original cumulative effects assessment (1 April 2025) submitted within the Environmental Statement. The development is included within our updated long list and short list of other existing and/or approved developments which captures planning applications from 2 April 2025 to 31 January 2026. The assessment of cumulative effects between the Project and this development can be found within the **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			2023/3574: Electricity Substation Park Road, Diss Installation of a solar farm comprising ground mounted solar panels; access tracks; string inverters; transformers; electrical connection compound; storage containers; underground cables and conduits; perimeter fence; temporary construction compound; and associated infrastructure and planting scheme (part of cabling in South Norfolk District only). Approved with Conditions 2024/1245: Phase 1 and West of A140, Norwich Road, Long Stratton Variation of condition 7 of 2018/0112 - amendments to house types and corresponding changes to layout and landscaping (phase 1 only). Approved with Conditions 2024/1734: Land East of Main Road, Swardeston Variation of conditions of permission 2022/0867 (Construction and operation of Energy Balancing Infrastructure (EBI) comprising energy storage technology, to form up to two areas of modular or containerised structures. To include containerised or modular battery array, transformers and inverter area, switchgear and control room building(s), connection of EBI plant to the Hornsea Three Onshore Converter Station (ONCS), required access and internal roads, drainage systems, perimeter and internal fences, and required external lighting and lightning pylons. Development is located within the Hornsea Three ONCS area as consented by the Hornsea Project Three Offshore Wind Farm Development Consent Order (DCO) in December 2020. The application is accompanied by an environmental statement.)- Condition 2 - Approved Plans, Condition 4 - Construction Traffic Management Plan, Condition 6 - Drainage Strategy, Condition 7 - Code of Construction Practice, Condition 9 - Soft Landscape works, Condition 10 - Ecological Mitigation, Condition 11 - Tree Protection. Pending Consideration 2024/2152: The Feather Mills, Park Road, Diss Variation of conditions 2 (approved plans and documents), 27 (reconfiguration of electric vehicle charging points) & 28 (drawings of off-site highway works) of consented planning permission 2022/2424 (which gave permission for the demolition of existing buildings on site; redevelopment of site to provide a retail foodstore (Class E) and associated car park, access, servicing and landscaping; and, the creation of new	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			access road off Park Road to serve foodstore and land to the west). Date of decision: 10 April 2024. Approved with Conditions 2024/3786: Land North and South of Brick Kiln Lane, Swainsthorpe Variation of conditions 1 (time period of permission), 2 (approved plans), 3 (decommissioning) 7 and 8 (site access) of 2021/2495. Approved with Conditions 2024/3817: Land to the North of Station Road, Tivetshalll St Margaret Solar photovoltaic (PV) farm development with ancillary infrastructure, security fencing and access. Approved with conditions 2024/3858: Land north of Hickling Lane, Swainsthorpe Variation of conditions 2, 3, 4, 5, 6, 9, 10, 11, 12, 13 & 15 of 2023/0617 - (2) Revised plans, (3) Access Design, (4) HGV Parking, (5) On-site Parking for Construction Workers, (6) Construction Traffic Management Plan (CTMP), (9) Landscaping Plan, (10) (Landscape & Ecological Management Plan (LEMP) , (11) Lighting, (12) Arboricultural Impact Assessment, (13) Archaeology & (15) FRA & SWDS. Pending Consideration 2025/1150: Land North of Church Road, Aslacton Outline planning application with all matters reserved (except access) for the erection of up to 36 dwellings, including amenity space, landscaping and all associated infrastructure. Development Management Committee authorised approval subject to S106 and Nutrient Neutrality resolution. 2025/1152: Land North of Hill Farm, Wacton Road, Forncett St Peter The installation of a Battery Energy Storage System (BESS) including associated infrastructure and landscaping. Pending Consideration 2025/1543: Park Road, Diss Erection of 3 storey, 66 bed care home for older people with associated landscaping, car parking and access. Pending Consideration	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			2025/1689: Land North of the junction of Market Lane and Carr Lane, Great Moulton Erection of a Battery Energy Storage System (BESS) and associated infrastructure including access, drainage, landscaping and other incidental works. Pending Consideration 2025/2275: Land East of Mulbarton Road, Keswick Construction and operation of a Battery Energy Storage System (BESS) and associated infrastructure including battery container units, medium voltage stations, 400/132/33kV substation, 2 No. 33kV customer substation, DNO control room, storage and welfare containers, fire water pumphouse, water storage tank, CCTV cameras, fencing, security gates, access tracks, landscaping and attenuation pond. Pending Consideration 2025/2789: Land East of Norwich Road, Tacolneston 15 No. residential dwellings with access road, open space, landscaping, drainage basin and other associated infrastructure. Pending Consideration 2025/2930: Land off St Mary's Road, Long Stratton Development of 45 affordable residential dwellings together with associated public open space, landscaping, highways and engineering works. Pending Consideration 2025/2952: Roadside Nurseries, Main Road, Swardeston Demolition of former nursery buildings and application for full planning permission for the erection of 30 No. dwellings and associated infrastructure. Pending Consideration 2025/3957: Land South of Swan Lane, Tharston Outline application (with all matters reserved except for vehicular access) for the construction of up to 103 dwellings together with new vehicular accesses, parking, public open space, play space, attenuation basins and enhanced landscaping. Pending Consideration	
			Colchester City Council CCC has checked tables A17.2.2 to A17.2.14 and fig 17.2 and confirm it is generally accurate but application 250545 on page 118 has been resolved to be approved by planning committee. The legal agreement is being	The Applicant has updated Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4, taking into

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			drafted, and the decision will be issued in the coming weeks. In addition, a planning application at Foxes Corner, Halstead Road, Ref 251310 for 250 dwellings has now been resolved to be approved by planning committee. The legal agreement is being drafted, and the decision will be issued in the coming weeks. This does not appear in the table and the site is close to the order limits in the Aldham Parish. Apart from the missing application noted above, regarding REP1 134 3.3, only para 3.3.25, the wetland creation scheme is listed for the CCC area. This is the correct application. The same is true for table 6.1.	account Colchester City Council's comments about planning application 250545. The Applicant has reviewed the additional application raised by Colchester City Council and this application (251310) has been included in an updated inter-project cumulative effects assessment in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** that has been provided at Deadline 4 (under reference CO44).
			Babergh and Mid Suffolk District Council Update on short listed developments: Please see Appendix 1. Interrelationship Report: Please refer to the BMSDC. Comments on Submissions received at Deadline 1 document ref **[REP2-113]**	The Applicant has reviewed Appendix 1 and **[REP2-113]**, and has updated **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** where relevant. This update has included adding the extent of the EcoPower Suffolk solar NSIP on the plan at Appendix A. The Applicant has reviewed the additional application raised by Babergh and Mid Suffolk District Council in **[REP2-113]** (DC/24/04832). The Council advised ID BMS22 was withdrawn and to refer to this planning application. The application is included within the updated long list of other existing and/or approved developments which captures planning applications from 2 April 2025 to 31 January 2026, within **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** provided at Deadline 4. However, no changes are required to the conclusions of potential inter-project cumulative effects with the other development previously reported in **Appendix 6.17.A3 Inter-Project Cumulative Effects Matrix [APP-284],** under ID BMS22.
			Thurrock Council The Council consider in regard to Environmental Statement Chapter 17 (cumulative effects): • TH1 – 19/01524/SCR - Applicant – Iceni Projects • TH12 – 21/01812/FUL - All Correct • TH18 – 18/00549/SCO - All Correct • TH22 – 19/01709/FUL - Application been refused – 27.03.2026 (also mentioned in the non-NISP section 3.3 in more detail) • TH23 – 19/00052/CV - All Correct • TH24 – 22/00812/SCR - All Correct • TH30 – 23/00897/SCO - All Correct	Thurrock Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**, submitted at Deadline 4.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			• TH33 – 23/01321/SCO - All Correct • TH35 – 23/01502/FUL - Application permitted – 24.01.2025 • TH37 – 24/01051/OUT - All Correct • TH38 – 24/01023/SCO - Date of Application – 25.09.2024 • TH40 – 25/00333/SCO - All Correct In terms of applications to be added. The Council considers that no new applications are required to be added. Non-NSIP (Relating to Thurrock) Section 3.3 • TH1 - Langdon Hills Golf and Country Club Lower Dunton Road Bulphan Essex RM14 3TY • No changes required • TH22 - Ingrebourne Valley Ltd - Orsett Quarry Buckingham Hill Road Linford Essex SS17 0PP • Status of this application is now Refused. • TH30 - Clearbrook Group Plc - Land Adjacent Sandown Road Collingwood Farm Quarry and East Quarry Stanford Road Orsett Essex • No changes required • TH40 - Bloor Homes - Land East of Chadwell St Mary Brentwood Road Chadwell St Mary Essex • No changes required 2.5.10 The Council note no mention of non-NSIP application relating to Thurrock in table 6.1.	
			Braintree District Council The Council have reviewed ES Chapter 17 table A17.2.9. Updates for the applications rated green are set out in Annexe B. The Council reviewed the interrelationship document and this formed part of our submission for deadline 2 (REP2 033). This highlighted a number of omissions and or changes required in Section 3 of REP2-033 and will not be repeated here.	Braintree District Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**. The Applicant responded to **[REP2-033]** in **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**. Planning application 26/00119/OUT has now been included in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**, provided at Deadline 4. Planning application 23/00816/OUT has not been included in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]**; **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** confirms that development was assessed in the original DCO submission in **6.17.A2 Environmental**

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
				Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] (see ID B12).
			Suffolk County Council SCC has reviewed Table A17.2.4 of **Appendix 17.2 [APP-283]** and Sheets 5-12 of Figure 17.2 **[APP-286]**. Concerning SCC1, application reference SCC/0105/22B has since been granted consent (22 July 2025) and implemented (5 August 2025). However, as the development resides on the opposite side of the A12, SCC does not foresee cumulative impacts for matters other than the impact of Heavy Goods Vehicle ("HGV") movements. No other major developments have been identified. SCC provided comments on the interrelationship report **[REP1-134]** within Table 6 of SCC's Comments on Submissions received at Deadline 2 **[REP2-040]**.	The Applicant has updated **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** to note that planning application SCC/0105/22B (SCC1) was implemented on 5 August 2025. The Applicant responded to the Council's **Comments on any further information or submissions received by deadline 1 [REP2-040]** in **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**.
			Tendring District Council 1. Updates to Developments Rated 'Green' in Table A12.2.7 (TDC Area) TDC understands that the ExA is seeking updated status information for the developments in the Tendring District Council area identified as "green" in Table A12.2.7. The updated positions are set out below. Updated Status Summary Site ID T3 – 21/02070/FUL Land adjacent to Lawford Grid Substation, Ardleigh Road, Little Bromley, CO11 2QB50 – Construction and operation of a 50 MW BESS, and related infrastructure with associated access, landscaping and drainage Development commenced Site ID T15 – 20/00480/DETAIL Land East of Bromley Road, Lawford, CO11 2HS Reserved matters for 100 dwellings (Phase 3 of 15/00876/OUT). Development commenced and well underway Site ID T16 – 20/00547/OUT Hamilton Lodge, Parsons Hill, Great Bromley, CO7 7JB Outline permission with detailed phase commenced.	Tendring District Council's updates on planning applications have been reviewed for any changes needing to be made in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**. The Applicant has reviewed the additional application raised by Tendring District Council, and this application (25/00176/FUL) is included (under reference T37) within the updated long list of other existing and/or approved developments which captures planning applications from 2 April 2025 to 31 January 2026, which is provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]** submitted at Deadline 4. The nature and scale of proposed development, and distance from the Project is not anticipated to give rise to cumulative effects, therefore the other development has not been shortlisted for assessment of inter-project cumulative effects. In response to Tendring District Council's comments on **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, the Applicant's inter-project cumulative effects assessment on receptors during construction and operation (and maintenance) of the Project has been provided in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and updated in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**. The Applicant's consideration and assessment of traffic generated by committed developments and transport

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Development commenced (phase 1) Construction on hold (developer in administration) Site ID T19 – 20/00782/OUT Land South of Long Road, Lawford, CO11 2HS Up to 76 dwellings with associated infrastructure. Development commenced and nearing completion Site ID T22 – 21/00197/DETAIL Land South of Long Road and West of Clacton Road, Mistley, CO11 2HN Reserved matters for up to 485 dwellings and 2ha employment land. Development commenced, approx. 25% complete Site ID T26 – 22/00958/FUL Land South of Long Road, Mistley, CO11 2HN 80 dwellings and a local convenience store. Development commenced 2. Other Major Developments in TDC Not Included in the Long / Short Lists 25/00176/FUL Ardleigh Oaks, Old Ipswich Road, Ardleigh CO7 7QR Demolition of buildings and creation of openair B8 storage facility. Application submitted Feb 2025; approved May 2025 TDC notes that this development is not included in either the long list or short list but is relevant to cumulative assessment in this area. 3. TDC Comments on Interrelationship with Other Infrastructure Projects (REP1134) Lawford Power Ltd (para 3.3.22) Land Adjacent to Lawford Grid Substation, Ardleigh Road, Little Bromley – 21/02070/FUL TDC disagrees with the Applicant's position that the only point of interaction with the Norwich to Tilbury (N2T) project is via Ardleigh Road. The cumulative and in combination interactions are far more extensive, given that construction and operational traffic associated with this development will also rely on:	schemes is detailed in sections 5.4 to 5.5 of **7.11 Transport Assessment [APP-333]** and in **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. The conclusions for these assessments are not duplicated in this report. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B]** has been updated to note the expectation that construction of the Flying Trade Group Development (planning application 20/00594/FUL) is anticipated to start before the end of 2026. In response to landscape and ecological impacts, the hedgerow along Wick Lane is shown in Section C Sheets 12,17 and 18 of **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section C [Revision B]**. In relation to cumulative effects, planning application 20/00594/FUL by Flying Trade Group on Wick Lane was identified in the cumulative assessment and taken forward to stage 3 / 4, with a moderate adverse significant effect during construction and operation identified for Landscape & Visual relating to receptors on Wick Lane. Refer to **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision A]**.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			– Bentley Road – Little Bromley Road – Grange Road – Waterhouse Lane – and several other rural lanes With multiple NSIPs and related projects likely to be all under construction concurrently, construction vehicle movements will overlap, and it will be impossible to determine which construction traffic relates to which project. This severely limits the LPA's ability to enforce haul route proposals/mitigation and / or require project specific traffic management. TDC therefore maintains that the Applicant has underrepresented the extent of interrelationship and the cumulative impacts associated with this development. Flying Trade Group Development (paras 3.3.23–3.3.25) Land Adjoining Ipswich Road and Wick Lane, Ardleigh – 20/00594/FUL TDC has confirmed with the Flying Trade Group that: – They intend to begin submitting precommencement condition discharge information imminently; – They must commence development within the remaining validity period of the permission (approx. 2 months left before planning permission expires); – Construction is therefore highly likely to begin later in 2026, overlapping with all NSIP schemes affecting the Tendring Peninsula. Despite this, TDC cannot identify any meaningful assessment within REP1134 (or the cross referenced documents) that deals with: a) In combination or cumulative effects b) The Applicant's response in the above-mentioned paragraphs is narrowly limited to maintaining flexibility in design to avoid sterilising the Flying Trade Group's approved scheme. It does not address the environmental, highways, landscape and other consequences of multiple overlapping construction programmes. c) Landscape and ecological impacts d) In particular, the Applicant has not properly and accurately assessed how the N2T pylon route and	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			associated haul routes will affect historic hedgerows along Wick Lane, including those the Flying Trade Group relies on for visual screening of its approved warehouse. TDC considers these trees and hedgerow losses to be a significant omission from the cumulative assessment. e) Highways impacts TDC cannot identify any assessment that adequately considers the combined construction traffic arising from: o N2T • Five Estuaries (FE) o North Falls (NF) o Lawford Grid Substation o Flying Trade Group's warehouse development o Other major local housing schemes TDC therefore considers the cumulative highways assessment to be incomplete and inconsistent with the scale of overlapping development activity expected in the locality – and this is not limited to only this development (as set out multiple times in TDCs LIR and RR).	
GEN 1.19	The applicant Norfolk County Council Suffolk County Council Essex County Council	**Statements of Common Ground - 2** The SoCG overview document [REP1-008] indicates that a SoCG with the Fire and Rescue Service for each county are not being produced, given thatthey have not responded to statutory consultation, however, may be captured as part of the County Councils' SoCG. No RRs have been submitted by the Fire and Rescue Services. • Each of the County Councils are asked to clarify whether they have any comments on the proposed development in respect of their Fire and Rescue Service. • The applicant is asked to include such matters in the next version of the SoCG.	**Essex County Council** ECC has engaged with Essex Fire and Rescue Service and is seeking to facilitate discussion with the Applicant. In the interim, Essex Fire and Rescue advise that the focus of their concerns is to receive reassurance regarding the continued unrestricted operation of the County's highway network. In addition, Essex Fire & Rescue will also be seeking confirmation that temporary compounds and other areas where staff and workers will be gathering, comply with relevant fire regulations and are accessible to emergency vehicles.	The Applicant will engage with Essex County Council and Essex Fire and Rescue Service as appropriate.
			Norfolk County Council NCC can confirm that Norfolk Fire and Rescue Service have no comments to make. NCC does not wish to speak for other local authorities, but our understanding is that unlike in Norfolk and Suffolk, in Essex there is a Fire and Rescue Authority which is separate from Essex County Council.	The Applicant notes that Norfolk Fire and Rescue Service has no comments to make. If any matters do arise, it is noted this will be included in Norfolk County Council's Statement of Common Ground.
			Suffolk County Council Suffolk Fire and Rescue Service ("SFRS") operate as a directorate of Suffolk County Council. Whilst the SoCG does not yet cover matters related to the SFRS, the next revision will do so. SFRS have provided the following comments:	The Applicant welcomes comments from Suffolk Fire and Rescue Service to be included in the next revision of Suffolk County Council's Statement of Common Ground, and will respond as part of that process.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Any application needs to ensure that suitable and sufficient arrangements are made to Fire and partner agencies for Water supplies, access for appliances and resources required to deal with the incident at any associated fixed installation or processing area. Provisions should be made to mitigate environmental and ecological impacts as a result of the preventative FRS operational activity in those areas and these arrangements should minimise the impact on resources post incident.	
GEN 1.20	The applicant General Aviation Awareness Council British Gliding Association North Falls Offshore Wind Farm Limited Five Estuaries Offshore Wind Farm	**Statements of Common Ground - 3** Table 1.3 of the SoCG overview document [REP1-008] sets out 30 potential SoCG which are not currently proposed or unlikely to be produced. The applicant is asked to review the need for SoCG with the following consultees, given that representations have been received in relation to their operations: Non-IPs: • East Anglian Air Ambulance • Broomfield Hospital (Air Ambulance) • Civil Aviation Authority (CAA) (Safeguarding and Airfield Advisory Team) IPs: • General Aviation Awareness Council • British Gliding Association The applicant is also asked to review the need for SoCG with North Falls and Five Estuaries. Whilst the ExA are aware that work underway on protective provisions is confidential until such point that terms are agreed, there are a number of other matters which affect the final design and co-ordinated approach to construction of these other NSIPs, which would benefit from being set out in a SoCG.	**Linda Smith** Point of information: the CAA Safeguarding and Airfield Advisory Team was disbanded last year. I understand, however, that the CAA has confirmed to the GAAC that, contrary to claims made by NGET, the CAA stands by all statements made by the Safeguarding and Airfield Advisory Team in relation to NGET's pylon proposals.	The Applicant has responded to similar points made in the General Aviation Awareness Council's Written Representation, in **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** (page 153).
GEN 1.21	The applicant All local authorities	**Legal Agreements** A number of the LIRs refer to the need for legal agreements in order to secure a range of mitigation and compensation measures and packages in each local authority area. The applicant is asked to: a) Provide a summary document/ tracker of all requests for agreements with local authorities including the type of agreement, what it relates to and how each would meet the relevant tests.	*The Applicant has provided a response to the local authorities through Appendix A of this document. This collates the list of agreements provided by the Councils in relation to this question and incorporates them into an updated tracker. As such the responses provided by the individual Councils are not reproduced in full for this question. One specific matter relating to lands agreement is provided below, as this does not relate to the legal agreements under discussion through GEN 1.21.*	Please see Appendix A to this document.

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
		b) Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. c) Consider whether one local authority's request for a certain agreement would also be appropriate for the same to be applied in any (or all) of the other local authority areas. All local authorities are invited to provide a list of and their understanding of the current status of any agreements which it has requested, together with a timescale for completion of any agreements which require sign off by the local authority.		
GEN 1.23	The applicant	Dunton Hills Garden Village 1 A number of IPs have made submissions in respect of the allocated site Dunton Hills Garden Village (DHGV), including Essex CC [RR-1083] and [REP1 161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150]. The site is included in the cumulative assessment [REFs] and the interrelationship report [REP1-134], and ES chapter 15 [APP-265] details this and other allocations on pages 115 and 116. These include North Billericay, Queens Park (AS1 Allocation) (Section G); DHGV (Section G); and Land West of West Mayne (Section G). The applicant is asked to provide a clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.	**Basildon Borough Council** *[Applicant Note: this was submitted by Basildon Council under their response to LUS1.12 however we believe this was in error and it was intended to response to GEN 1.24; it is therefore included in this section].* We welcome the provision by the Applicant as requested by GEN 1.23 of the provision of the "clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.". We believe that this will illustrate the degree of impact that will be caused. Holford Rule 7 states that "When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development" this has been quoted elsewhere in answer to GEN 1.24, evidence being sought of a hierarchy of mitigation approach. This approach appears to be at odds with the Applicant's position.	The Applicant provided the plan in response to GEN 1.23 as Appendix C of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant provides comment on responses to GEN 1.24 referencing Holford Rule 7 below.
GEN 1.24	The applicant BTSurveyors (for LIH Dunton Hills Limited) Essex CC Basildon BC Brentwood BC	Dunton Hills Garden Village 2 The RRs and LIRs from Essex CC [RR-1083] and **[REP1-161]**, Basildon BC [RR-0335] and Brentwood BC [RR-0391] and **[REP1-150]** make detailed comments regarding potential effects on the viability and delivery of the DHGV allocation which may be affected by the OHL infrastructure. Existing pylon infrastructure is in place on and around DHGV. Work no. 33 includes the replacement of part of an existing overhead distribution electric line. The works include removal of 1.9 kilometre (km) of existing pylons and OHLs (route PSC) and the installation of 1.6km of new underground distribution electric line, with a temporary diversion of the existing line. These works are	**Essex County Council** a) ECC understands that there is no agreement in place for the removal of the existing overhead electricity lines that cross the site. b) The development of the Garden Village at Dunton Hill assumes the existing UKPN OHL are to be removed by a third party. This position is reflected in the developable area and the viability assessment underpinning the delivery of the affordable housing and associated infrastructure where no money is allocated to undertake this work. It is also noted that paragraph 22 of LIH Relevant Representation (RR-0421) states "The scheme has been devised on the assumption that the existing 132kV overhead	a) No response. b) Essex County Council and Brentwood Borough Council confirm that whilst the development of Dunton Hills Garden Village (DHGV) assumes that the existing UK Power Networks overhead lines are to be removed by a third party and that this position is reflected in the developable area, the viability assessment underpinning the delivery of the DHGV site does not allocate any money to undertake this work. This appears to the Applicant to be a significant omission in the viability work that has been undertaken to support the delivery of DHGV because, even if the UK Power Networks overhead lines were to be removed by a third party,

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		shown on works plans section G (sheet 6 of 6) **[APP-023]** and section H (sheet 1 of 7) **[APP-024]**. However the submissions include limited consideration of the existing OHL which crosses the allocation, and the proposals by the applicant to remove and underground part of the existing electric lines. a) The applicant and BTSurveyors (for LIH Dunton Hills Limited) are asked to clarify whether the other existing OHLs which runs westwards across the DHGV allocated site would remain in place or be undergrounded or diverted. b) The local authorities and BTSurveyors (for LIH Dunton Hills Limited) are asked to provide specific comment on Work no. 33, and clarify whether both existing OHLs were included in their assessment of viability of the DHGV proposals. c) The local authorities are asked to respond to the applicant's comments (response to RRs **[REP2-023]** and response to LIRs **[REP2-030]**). In particular regarding the ability to co-exist, the routing of the proposed OHL within a high pressure gas pipeline safety zone, the restrictions placed by existing development, and that the suggested alternative (an underground cable) would lead to direct loss of part of the DHGV development area. d) The local authorities are asked to provide a response to the applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs **[REP2-030]**. e) The local authorities and BTSurveyors for LIH Dunton Hills Limited are also asked to clarify updated timescales for a planning decision to be issued relating to application 21/01525/OUT, for reserved matters applications to be submitted, and for expected commencement (and phasing) of the DHGV development, so that the ExA is able to make a more informed review of cumulative construction effects.	electricity lines will be removed from the centre of the site and diverted underground elsewhere". c) ECC has reviewed the Applicant's comments in its response to RRs (REP2-023) and response to LIRs (REP2-030). ECC acknowledges the complexity of route selection especially given the presence of heritage assets in the vicinity of Dunton Hall. However, ECC has raised significant concerns about DHGV from the very start of this process when responding to the first Non Statutory Consultation in 2022. The amendments to the Norwich to Tilbury scheme which the local authorities are seeking, are considered to be relatively minor and while the logic of following the safety zone for the high pressure gas main can be understood, it does not in the opinion of ECC, address the fundamental environmental concerns raised in respect of safeguarding the principles and objectives of the DHGV. In maintaining its preference for this route, the Applicant refers to the proposed route being the least worst options in terms of its environmental effects. ECC believes these changes do not respect the design objectives for the garden village (or the wider development aspirations identified in current and emerging local plans. The Applicant in its defence of the route selection to the east of DHGV does not raise any technical objections to the undergrounding of the electricity cable and its alignment in the same corridor as the high pressure gas main. ECC believes there is no objection in principle to these underground services running in close proximity subject to the appropriate safeguards being introduced and ECC would have expected this to have been explored in greater detail by the Applicant. Reference is made to Holford Rule 7 as the rational for selecting the route to the east of DHGV. While for the reasons set out in its LIR, ECC does not fully concur with the justification, it considers a hierarchy of potential mitigation should have been explored. Holford Rule 7 states that "When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development" and goes on to state in supplementary guidance that in addition to adopting appropriate routeing, [the proposer} evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified". While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), ECC considers greater weight	presumably UK Power Networks itself, the Applicant understands that, as is standard practice in such circumstances, there would be a cost associated with those works that UK Power Networks would seek to pass on to the landowner or developer. The Applicant can confirm that the Project includes the removal of one of the UK Power Networks overhead lines and that the Applicant intends to absorb the cost of its removal. Accordingly, should the Project proceed, the landowner or developer of DHGV would only be required to bear the cost of the removal of one of the UK Power Networks overhead lines, whereas should the Project not proceed, the landowner or developer of DHGV would be required to bear the cost of the removal of both of the UK Power Networks overhead lines. Notwithstanding, the Applicant notes that the landowners/developers, in their response to this part of the question, have confirmed that it is not expected that the DCO Project will affect the viability of the site and even if it transpires that the Project does create any financial loss, LIH will seek to recover this from NGET (as set out in the draft Statement of Common Ground). c) In response to this part of the question and to avoid repetition the Applicant wishes to refer the ExA to paragraphs 3.8.6-3.8.11 and B.7.43 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary this sets out the Applicant's position that DHGV was considered during routeing and refinement of the alignment, which took account of the guidance provided by the Holford Rules, requiring a careful balance of competing constraints and Rule compliance. Furthermore, the Applicant has correctly applied the policy tests in identifying locations for undergrounding. Neither 2024 NPSs EN-1 nor EN-5 specifically refer to garden villages. There is therefore no special status afforded to garden villages in the NPSs which are the primary consideration for determining the DCO application. d) The Applicant notes that Essex County Council and Brentwood Borough Council have not responded to its commentary on the Savills Report at this deadline.

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			should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted but ECC considers this would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV. d) A response to the Applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs [REP2-030], will be provided at Deadline 4. e) Brentwood District Council in conjunction with ECC, are currently working towards sealing the agreement and the decision notice for the outline planning permission being issued in early May. The applicants (LIH) have already commenced discussions regarding the submission of reserved matters which are expected Q2/Q3 once the outline planning permission is issued.	e) The Applicant welcomes the fact that Essex County Council and Brentwood Borough Council confirm that the S106 agreement and the decision notice for the DHGV planning permission will be issued in May and that the landowners/developers (LIH) have already commenced discussions regarding the submission of reserved matters, which are expected in Q2/Q3 2026, notwithstanding the progress of the Project. The Applicant also notes that the landowners/ developers, in their response to this part of the question, have confirmed that the S106 Agreement is progressing well, and it is expected that that the Decision Notice will be issued in a matter of weeks. They also go on to confirm that they intend to submit reserved matters applications for enabling works and advanced infrastructure works in May 2026 and be on-site commencing strategic infrastructure and utilities by September 2026. Furthermore, in relation to any potential effect of the Project, they confirm that DHGV will be built out over several years, with the most easterly part of the site (where the Project is proposed) being in the later phases and therefore several years away from development.
			Basildon Borough Council Basildon understands that there is no agreement in place for the removal of the existing overhead electricity lines that cross the site. The development of the Garden Village at Dunton Hill assumes the existing UKPN OHL are to be removed by a third party. This position is reflected in the developable area and the viability assessment underpinning the delivery of the affordable housing and associated infrastructure where no money is allocated to undertake this work. It is also noted that paragraph 22 of LIH Relevant Representation (RR 0421) states "The scheme has been devised on the assumption that the existing 132kV overhead electricity lines will be removed from the centre of the site and diverted underground elsewhere". Basildon acknowledges the complexity of route selection especially given the presence of heritage assets in the vicinity of Dunton Hall. However, significant concerns were raised about DHGV from the very start of this process when responding to the first Non Statutory	

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			Consultation in 2022. The amendments to the Norwich to Tilbury scheme which we as the local authorities are seeking, are considered to be relatively minor and while the logic of following the safety zone for the high pressure gas main can be understood, it does not address the fundamental environmental concerns raised in respect of safeguarding the principles and objectives of the DHGV. In maintaining its preference for this route, the Applicant refers to the proposed route being the least-worst options in terms of its environmental effects. Basildon, along with Brentwood and ECC believe these changes do not respect the design objectives for the garden village (or the wider development aspirations identified in current and emerging local plans. The Applicant in its defence of the route selection to the east of DHGV does not raise any technical objections to the undergrounding of the electricity cable and its alignment in the same corridor as the high pressure gas main. There is no objection in principle to these underground services running in close proximity subject to the appropriate safeguards being introduced. It would be expected that this would have been explored in greater detail by the Applicant. Reference is made to Holford Rule 7 as the rational for selecting the route to the east of DHGV. For the reasons set out in ECC's LIR, we also agree with ECC and do not concur with the Applicant's justification. However, a hierarchy of potential mitigation should have been explored. Holford Rule 7 states that "When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development" and goes on to state in supplementary guidance that in addition to adopting appropriate routeing, [the proposer} evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified" . While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted	

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			but this would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV.	
			Brentwood Borough Council The development of the Garden Village at Dunton Hills assumes the existing UKPN OHL are to be removed by a third party. This position is reflected in the developable area and the viability assessment underpinning the delivery of the affordable housing and associated infrastructure where no money is allocated to undertake this work. It is also noted that paragraph 22 of the LIH Relevant Representation (RR-0421) states "The scheme has been devised on the assumption that the existing 132kV overhead electricity lines will be removed from the centre of the site and diverted underground elsewhere". BBC notes that ECC has reviewed the Applicant's comments in its response to RRs (REP2-023) and response to LIRs (REP2-030) and acknowledges the complexity of route selection, especially given the presence of heritage assets in the vicinity of Dunton Hall, but ECC has raised significant concerns about DHGV from the very start of this process when responding to the first Non Statutory Consultation in 2022. The amendments to the Norwich to Tilbury scheme which local authorities including BBC are seeking are considered to be relatively minor, and while the logic of following the safety zone for the high-pressure gas main can be understood, it does not in the opinion of ECC, supported by BBC, address the fundamental environmental concerns raised in respect of safeguarding the principles and objectives of the DHGV. In maintaining its preference for this route, the Applicant refers to the proposed route being the least worst option in terms of its environmental effects. BBC believes these changes do not respect the design objectives for the garden village (or the wider development aspirations identified in current and emerging local plans). The Applicant in its defence of the route selection to the east of DHGV does not raise any technical objections to the undergrounding of the electricity cable and its alignment in the same corridor as the high-pressure gas main. BBC believes there is no objection in principle to these underground services running in close proximity subject to the appropriate safeguards being introduced and BBC would have expected this to have been explored in greater detail by the Applicant.	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Reference is made to Holford Rule 7 as the rationale for selecting the route to the east of DHGV. While for the reasons set out in its LIR BBC does not fully concur with the justification, it considers a hierarchy of potential mitigation should have been explored. Holford Rule 7 states that "When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development" and goes on to state in supplementary guidance that "in addition to adopting appropriate routeing, [the proposer} evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified". While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), BBC considers greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted but BBC considers this would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV. Please see appendix provided by ECC in response to this. Brentwood Borough Council in conjunction with ECC, are currently working towards sealing the agreement and the decision notice for the outline planning permission being issued in early May. The applicants (LIH) have already commenced discussions regarding the submission of reserved matters which are expected Q2/Q3 once the outline planning permission is issued.	
			BTS on behalf of LIH Dunton Hills Ltd a) The existing OHLs would be undergrounded and diverted. The planning application has been devised on this basis. b) The planning application has been devised on the basis that both OHLs are removed. It is not expected that the DCO Project will affect the viability of the site. If it	

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			transpires that the DCO Project does create any financial loss, this will be recovered by LIH from NGET (as set out in the draft Statement of Common Ground). e) The S106 Agreement is progressing well, and it is expected that that the Decision Notice will be issued in a matter of weeks. Thereafter, reserved matters applications (for Enabling Works and Advanced Infrastructure Works) will be submitted in May 2026 and on site commencing strategic infrastructure and utilities by September 2026. The Dunton Hills scheme will be built out over several years. The most easterly part of the site (where the new 400kV lines are proposed) is in the later phases and is therefore several years away from development.	
GEN 1.25	The applicant BTSurveyors (for LIH Dunton Hills Limited) Essex CC Basildon BC Brentwood BC	**Dunton Hills Garden Village 3** Clarify the location of the play area to the south eastern corner of DHGV site (as shown on in appendix 8 [RR-0421] and provide comment as to whether it is feasible for this area to be designed around or relocated within the proposed development when detailed plans are submitted.	**Essex County Council** The location of the play area was specified in the approved land use parameter plan considered by Brentwood's Planning Committee when resolving to grant outline planning permission. It therefore forms part of the decision. The play areas are distributed across the development such that they are within easy walking distances for the community. Whilst there may be scope to refine the location at RM stage, this should not undermine the overall play strategy, design or placemaking for the development, , which form part of the garden village design objectives. **Basildon Council** The location of the play area was specified in the approved land use parameter plan considered by Brentwood's Planning Committee when resolving to grant outline planning permission. It therefore forms part of the decision. The play areas are distributed across the development such that they are within easy walking distances for the community. Whilst there may be scope to refine the location at RM stage, this should not undermine the overall play strategy, design or placemaking for the development, which forms part of the garden village design objectives. **Brentwood Borough Council** BBC can clarify that the location of the play area was specified in the approved Framework Masterplan document considered by BBC's Planning Committee when resolving to grant outline planning permission, therefore forms part of the decision. The play areas are distributed across the development such that they are within easy walking distances for the community. Whilst there may be scope to refine the location at RM stage,	The Applicant can confirm that, should the location of the play area referred to be refined as a result of the Project, then such a refinement would not be so significant as to undermine the overall play strategy, design or placemaking for the DHGV development overall. Whilst the landowners/developers, in their response to this part of the question, have confirmed that there is expected to be sufficient space within the site to design around or relocate the play area, they have mentioned that there is a possibility that this may result in a small loss in net developable area within the adjacent land parcel. The Applicant will seek to discuss this matter further with the landowners/developers so that it can be confirmed that developable area will not be adversely affected.

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			this should not undermine the overall play strategy, design or placemaking for the development, which form part of the garden village design objectives. **BTS on behalf of LIH Dunton Hills Ltd** There is expected to be sufficient space within the site to design around or relocate the play area, if required, however, there is a possibility that this may result in a small loss in nett developable area within the adjacent land parcel.	
GEN 1.26	The applicant	**Assessment of cumulative effects** The ExA notes that the interrelationship report **[REP1-134]** is a useful document however this does not form part of the ES. The ExA considers that the assessment of inter-project effects for certain issues in section 17.5 of ES **Chapter 17 [APP-281]** would appear quite cursory. Justify the assessment methodology you have used to assess inter-project cumulative effects in ES Chapter 17. In particular, explain how you have reached the conclusion that for certain areas of the proposed development, such as in the vicinity of the EACN substation and Tilbury North substation, you have reached the conclusion that the cumulative inter-project effects would be "negligible" and "not significant" for matters such as air quality, biodiversity, socio-economics, recreation and tourism, and health and wellbeing; with the noise effects assessed as being slight adverse within the 300 metre (m) zone of influence.	**Ardleigh Parish Council and Little Bromley Parish Council** The assessment of cumulative effects on the ALBA has always been a key issue of the Parish Councils. As succinctly captured in 8.4.1 (page 568 "Landscape and Visual") there are significant adverse visual effects within the ALBA, however, this does not appear to have been assessed as part of an explicit assessment of the cumulative effects on the ALBA. Further, the Parish Councils have been unable to find evidence of any cumulative assessment of other impacts – for example, there has been no assessment that includes: a) The impact of 1200 vehicles per day coming from the east and west of the ALBA to reach the construction site of the EACN, and then the continued (post construction) servicing of the EACN, together with the construction traffic that will be associated with the Five Estuaries and North Falls development. b) The impact of a construction phase with operating hours of 7am-7pm, with a slightly reduced period of weekend working hours. There will be no respite for residents at all during the construction phase and that will have clear impacts on health and well-being. This is particularly true when considered alongside other construction traffic that will arise from other development. c) The impact that a loss of jobs locally will have upon those living in the ALBA (as raised in APC's response in June 2024 to the Applicant's Statutory Consultation) d) Little Bromley is a small village with approximately 100 houses of which 13 are listed. This includes the War Memorial which is adjacent to the proposed permanent access road. LBPC are concerned that the War Memorial, listed as a building of Special	The methodology used to undertake the inter-project cumulative effects is in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. It is also structured using the staged assessment approach detailed in the Planning Inspectorate's Cumulative Effects Assessment Guidance[1]. The detail provided in the assessment is similar to inter-project cumulative effects assessments undertaken for other linear Nationally Significant Infrastructure Projects (NSIPs) such as on National Grid's Bramford to Twinstead Project. a) The Projects traffic data includes cumulative movements, including those from North Falls and Five Estuaries. Therefore 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] inherently include a cumulative assesses. b) **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** considered the Projects working hours when undertaking the assessment and did not identify any likely significant effects. In addition, **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** identified negligible and not significant effects with the North Falls and Five Estuaries projects. c) Significant job losses are not anticipated from the Project. Any potential job losses due to the potential permanent acquisition of land from the entire extent of the Fishing lake north-west of Ardleigh is subject to separate discussion with the landowner regarding potential compensation and this matter falls beyond the scope of the EIA. . d) Potential vibration impacts to the War Memorial is responded to in 8.17 Response to Rule 17 Letter –

[1] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*

Reference	Question Addressed to	Question	Response from Interested Parties or Affected Person	Applicant's Comment
			Architectural or Historic Interest and listed as Grade II is at risk. Document: 2.2 Land Plans - Section C [APP 011] indicates that it sits within an area of compulsory purchase, it will be impacted by the vibrations from the sheer volume of traffic and could result in accidental damage through construction traffic. The general setting of the war memorial within Little Bromley, including its outlook on a "heritage hedge", is particularly notable; however, it seems that this "heritage hedge" will be removed. St Mary the Virgin Church in Little Bromley will also be under threat as the siting of the Five Estuaries/North Falls haul road and the Applicant's permanent access road will surround this Grade II listed church. The Parish Councils agree with the ExA that what has been prepared so far suggests a "cursory" approach to cumulative effects.	Historic Environment – submitted at Deadline 4. Impacts through change to the setting of the War Memorial are assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** – page 148 – 149. The Grade II* listed Church of St Mary (1337175) is assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** – page 139-140 and 1098.

3. Design parameters and other details of the proposed development

Table 3.1 Design parameters and other details of the proposed development

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
DES 1.3	The applicant	**Independent design review** The **Design and Access Statement [APP-353]** states in Appendix B that in the context of independent design review there is no intention to include design reviews post-consent (if consent is granted) as the project is "deemed to be achieving and meeting Good Design". In addition to the above, the ExA note that a number of IPs have indicated the need for an independent design review to be secured as part of any DCO made. In the light of the applicant's **Design and Access Statement [APP-353],** especially Appendix B – Internal Design Review Note, the ExA is not persuaded, on the basis of the evidence provided to date, that a non-independent design champion(s) would be adequate or that a full independent Design Review Panel for the Proposed Development is not required. Provide further justification for your view that independent design review is not needed for the proposed development. Refer in your reasoning to the Planning Inspectorate Guidance Note Advice on Good Design. The ExA also note that the development consent order for the Five Estuaries offshore wind farm included a provision within requirement 5 to ensure that the onshore substation for that project will be subject to an independent design review and this should be referred to in your reasoning.	**Essex County Council** *Consistent approach across all NSIPs* The Planning Inspectorate's Advice on Good Design confirms that good design is an iterative process that should continue beyond the granting of consent, particularly for large-scale and nationally significant infrastructure projects. The guidance emphasises that independent design review can play a critical role in: • Testing and refining design responses to context; • Providing objective scrutiny at key stages of design evolution; • Supporting confidence that design quality will be delivered on the ground rather than remaining aspirational. Given the scale, complexity, and rural siting of the Proposed Development, reliance solely on internal and non-independent design champions does not provide the level of assurance expected for a project of this nature. Independent review offers a demonstrably robust mechanism to ensure that evolving detailed design responds appropriately to landscape character, visual effects, layout, scale, materials, and cumulative impacts. The Proposed Development is co-located within a rural landscape that is also accommodating other NSIPs. This shared landscape context heightens the importance of a coordinated and transparent design process. An independent design review panel would provide an effective forum to: • Consider cumulative and in-combination effects arising from multiple developments; • Encourage consistency and coherence in design principles across co-located projects; • Facilitate collaboration between projects where design decisions may have shared visual or landscape implications. In this context, independent design review is not merely a matter of design quality in isolation but a means of managing change sensitively within a valued rural environment.	National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery. The Great Grid Partnership enterprise delivery model also has a clear vision to drive sustainability outcomes. It is noted that there is not a mandatory requirement to appoint an independent design review panel for Nationally Significant Infrastructure Projects (NSIPs). Policy and guidance identify a range of mechanisms through which good design outcomes may be achieved. Independent design review is one such mechanism, but not a requirement. The Applicant has demonstrated a clear and sustained commitment to achieving good design in accordance with National Policy Statement (NPS) EN-1 (2024), particularly Section 4.7, and NPS EN-5 (2024), which recognise that the form and appearance of electricity transmission infrastructure are heavily influenced by functional, safety and security requirements, with opportunities for good design primarily arising through routeing, siting, landscape integration and mitigation. As outlined in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, should consent for the Project be forthcoming, post-consent design reviews will be overseen through the Applicant's established governance structures, including the Delivery and Detail Design Champion, rather than through a separate independent design review panel. Paragraph 4.7.2 of NPS EN-1 states: '*Applying good design to energy projects should produce sustainable infrastructure sensitive to place … efficient in the use of natural resources … and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible*'. NPS EN-1 also recognises under paragraph 4.7.6 that there may be limited choice in physical appearance of energy infrastructure, but there could be

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			The Examining Authority rightly draws attention to the Five Estuaries Offshore Wind Farm DCO, which secured an independent design review for its onshore substation through Requirement 5. That requirement reflects a recognition that, notwithstanding positive design intentions at application stage, independent scrutiny post-consent is necessary to ensure that detailed design responds effectively to context and stakeholder concerns. There is no clear justification for adopting a different approach for the Proposed Development, particularly given the similarities in infrastructure type, landscape sensitivity, and potential for significant visual effects. Aligning the approach to independent design review with that secured for the Five Estuaries project would therefore be reasonable, proportionate, and consistent with recent consenting practice. It is also expected a similar approach for independent design review process would be applied to the forthcoming North Falls windfarm, should consent be given. *Crucial Design Coherence* ECC does not accept the proposition that the external appearance of the EACN should default to a uniform dull silver grey or similar utilitarian finish purely on the basis of reduced maintenance requirements. Such an approach risks prioritising operational convenience over design quality and landscape sensitivity, leading to outcomes that would be wholly inappropriate in a rural location of this character. A monotone, industrial colour palette would sit uncomfortably within the surrounding countryside and would be particularly harmful given the close proximity of the onshore substations for North Falls and Five Estuaries. Treated in isolation, such design decisions risk creating a visually discordant cluster of large scale installations that cumulatively erode landscape quality rather than responding positively to context. ECC strongly supports the principle, already accepted for North Falls and Five Estuaries, that Environmental Colour Assessment should inform final colour and material choices, recognising that matters such as tone, reflectivity, texture, and weathering characteristics are central to how infrastructure is perceived in the landscape. These considerations require contextual judgement rather than a standardised or lowest maintenance solution. A design approach driven primarily by maintenance efficiency risks delivering buildings that appear stark, reflective, and visually dominant, resulting in precisely the kind of harm that good design is intended to avoid.	opportunities to demonstrate good design in terms of siting. This can all be achieved through the appointment of a design champion and post-consent design reviews. The Project has already established, through the DCO application, the appropriate design documentation **7.15 Design and Access Statement [REP2-020]** (DAS) and **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** that provide substantial guidance on design vision, principles, quality, colour and materials, with a focus on Substations and Cable Sealing End compounds. The **Design and Access Statement [REP2-020]** was updated at Deadline 2 to confirm the Design Champion function will be delivered through two complementary roles to 'secure' the orderly transition from Development to Delivery giving confidence that Good Design will sustain post consent in accordance with the Planning Inspectorate Advice on Good Design (2024): *'assemble, research, co-ordinate and secure'*. The East Anglia Connection Node (EACN) is proposed to be an Air Insulated Switchgear (AIS) substation which provides better landscape integration due to lower building mass. There is no scope to vary the colour and finish of the electrical equipment needed. As shown in Image 4.2 (page 49) **7.16 Design Approach for Site Specific Infrastructure [Revision B]** the majority of the AIS development footprint will comprise of space to accommodate functional electrical equipment with ancillary prefabricated buildings, fibreglass or steel containers or enclosures for specific systems. The EACN substation will be constructed to National Grid's design standards and will include a number of shunt reactors, AIS equipment, a new central control building, a PRR and other necessary equipment. In addition, several small buildings would be constructed to house electrical equipment, battery storage and workshops, together with suitably sized office/amenity buildings. The position on final colour and material finish of the several small buildings proposed at the EACN can be reviewed in light of the Design Champion appointment. National Grid designs substations following strict safety standards, policies, and international guidelines. The layout ensures protection for workers, the public, the local community, and the environment. It also safeguards equipment and allows safe access for installation,

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			This reinforces the importance of independent design review as a constructive and enabling process, rather than a procedural burden In a landscape accommodating multiple large scale energy projects, design coherence is essential. Independent design review offers a transparent mechanism to manage cumulative effects collectively rather than retrospectively. It provides confidence that EACN will not adopt a materially different or lower quality approach to colour, materials, or architectural expression than the neighbouring projects, and that decisions will not be driven solely by expediency. In ECC's view, this is precisely where independent design review adds value: not by forcing uniformity, but by facilitating informed, collaborative decision making that leads to compatible, well considered outcomes across all three NSIPs.	maintenance, and removal. Meeting these safety standards, seeking to reduce visual and environmental impact, minimise the overall use of land and taking into consideration existing utilities and site topography means that once the basic design is set the potential for change is limited. The Applicant has been a co-operating partner, responding to consultation on the Five Estuaries and North Falls Joint Substation Design Guide to ensure no conflict with 7**.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]**. The Applicants comments can be found in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision B] - Appendix B:** • B.3 Applicant's September 2025 consultation response to North Falls and Fiver Estuaries Offshore Wind Farms' Joint Substation Design Guide • B.4 Applicant's March 2026 consultation response to North Falls and Five Estuaries Offshore Wind Farms' Joint Substation Design Guide Version 01 To demonstrate commitment towards securing Good Design, the Applicant will confirm the governance and assurance process including design review at the detailed design stage in the Design Champion Brief to be included within the **Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** to be updated at Deadline 5.
			Chelmsford City Council CCC considers that design review should be undertaken for the Project especially within the Great and Little Waltham gap.	The Applicant's position is that CCC are potentially misinterpreting the purpose of a design review. This is not intended to revisit the route alignment or selection of technology. In relation to specific areas of the route, the Applicant has confirmed the design champion function will oversee variation based on the Limits of Deviation or the landscape mitigation proposals - as detailed in **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** and, at the EACN, informed by the North Falls and Five Estuaries design decisions.
DES 1.4	The applicant	**Design Champion(s)** Paragraph 5.6.8 of the **Design and Access Statement [APP-353]** states that a design champion will be appointed to provide independent oversight and will act as a critical friend. Explain how the appointed design champion will provide independent oversight. Detail in the Deadline 2 updated Design and Access Statement [REP2-020] is noted but the Development Design	**Chelmsford City Council** To avoid conflict of interest, any design champion should be independent and appointed externally.	The Applicant has set out in response to DES 1.4 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** how the proposed design champion would be an advisory role independent of the design team, consistent with recommendations from Defining and Developing the Design Champion Role: Research Report (2023) by the Institute of Civil Engineers. Neither National Policy Statement EN-1 (2024) nor the Planning Inspectorate's Advice on Good Design[1] requires

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Champion appears to be from the existing project team and the question therefore remains. In the light of the above, explain how the role of a design champion will influence, in an enforceable manner, the design of the proposed development post making of a DCO; and how the design champion is to be secured within the DCO, should it be made.		the design champion to be independent for delivering on any good design objectives. The design champion function would be delivered through two complementary roles whose emphasis changes over time. The Development Design Champion (DDC), a senior internal figure appointed from the existing project, will be independent of the Great Grid Partnership (GGP). The Delivery and Detail Design Champion (DDDC) will be contracted into National Grid from the Arup–AECOM Joint Venture (AAJV) under the Lot 1 Design Consenting & Environmental Partner of the GGP. The appointment of the DDDC from the AAJV provides additional client-side assurance outside the internal National Grid project team. More information can be found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, specifically DES 1.4. The Applicant is committed to producing a Design Champion Brief for inclusion within next iteration of the **Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** to be updated at Deadline 5.
DES 1.5	The applicant	**Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** The **DASSI [APP-354]** seeks to justify the choice of Air Insulated Switchgear (AIS) for the proposed EACN substation rather than use Gas Insulated Switchgear (GIS). Are the proposed substations for the Five Estuaries and North Falls wind farms AIS or GIS? What technology is the Tarchon Interconnector likely to employ (AIS or GIS). Explain how the design choices for each of the substations are assimilated and how they will tie in together.	**Ardleigh Parish Council and Little Bromley Parish Council** The Parish Councils have been consulted on the design of the Five Estuaries and North Falls design. However, they have not been consulted on the Tarchon design (yet) and are not aware of whether the Applicant, Five Estuaries, National Falls and Tarchon have been working together on a co-ordinated approach to design. The Parish Councils share the ExA's concern as to how the substations infrastructure will tie together, along with stated potential for further development(s).	It is the Applicant's understanding that North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm are progressing as Air Insulated Switchgear designs which is consistent with the Applicant's plans. As of May 2026 there was no confirmed design or location for the Tarchon Interconnector Project; that project remains at an early stage. As set out in paragraphs 3.2.3 to 3.2.11 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects (Revision B)**, the Project has held regular meetings with the Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm project teams, with the three projects teams working collaboratively on matters including cumulative traffic effects and landscape planting. The three project teams have prepared two tripartite documents – a Tripartite Position Statement and an Outline Protocol (Onshore substations operational noise and the outline noise complaints protocol) – both of which are provided in Appendix B of **8.4.3 Report on Interrelationship with Other Infrastructure Projects (Revision B)**. The Applicant has entered into a statement of common ground with the Tarchon Interconnector Project (**8.3.62 Draft Statement of Common Ground - Tarchon (Revision B)**). The EACN substation has been located with both local constraints and the contracted connecting customers in

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				mind. It is located to the east of a Network Rail owned railway track which the Project's overhead line and underground cable then must cross. By doing so it avoids causing multiple additional track crossings stemming from the corridors that would be required to accommodate North Falls Offshore Wind Farm, Five Estuaries Offshore Wind Farm and Tarchon Energy Limited Interconnector when connecting to the EACN substation. Please also refer to paragraphs 2.3.1 - 2.3.3, 6.5.9 and 6.5.13 of **5.15 Design Development Report [APP-122]** for further evidence of design coordination between the two offshore wind farm projects and the Project.
DES 1.6	The applicant	**Holford Rules** Set out how Holford Rule 1 been applied in designing the route of the proposed development, specifically for the following areas: • Dedham Vale National Landscape • Waveney Valley • Great and Little Waltham • Mellis Also provide further information on the application of Rule 4 for the route of the proposed development, including details of where the route crosses ridge lines.	**Chelmsford City Council** The Holford Rule 1 only relates to national designations. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national heritage policy and guidance. There is no reference within them high level national designations such Grade one listed buildings. CCC considers that national planning policy guidance should supersede the Holford Rules. Within Great & Little Waltham, the scale of change would be large, and the effect would be major and significant (adverse), reducing to moderate and significant (adverse) within Little Waltham. The cumulative effect of multiple pylons and the continuous overhead linear nature of the Project, means that the collective impacts would create an overall significant adverse effect at both construction and operation.	For overall context, Section 1.3 of **5.15 Design Development Report [APP-122]** sets out the policy context for the decision making. In respect of Holford Rule 1, the only area that meets the definition of 'major areas of highest amenity value' is the Dedham Vale National Landscape. The Applicant has set out in its response to question DES 1.6 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** why it is not possible to avoid this area as a result of the other constraints to the south of Colchester. The other areas identified in the question, Waveney Valley, Great and Little Waltham and Mellis do not meet the definition of areas of highest amenity value. We also set out in that response our approach to the application of Rule 4. The Applicant notes the view of Chelmsford City Council, but is also clear that the relevant policy context is set fundamentally by NPS EN-1 (2024) and EN-5 (2024) which reiterate the need for the Holford and Horlock Rules to be '..*embodied in the applicants' proposals*...' (paragraphs 2.9.16 and 2.9.18 of NPS EN-5 for the Holford and Horlock Rules, respectively). The Applicant would reiterate that, throughout the development of the Project, the Holford Rules have been considered in conjunction with information on the presence of constraints, homes and environmental features and the findings of the Environmental Impact Assessment process to inform balanced decision making through which we define our proposals that are refined in response to feedback. **5.6 Planning Statement [APP-085]** presents an appraisal of the Project's compliance with national policy including NPSs EN-1 (2024), EN-5 (2024), EN-3 (2024) and the NPPF. **5.6 Planning Statement [APP-085]** also identifies relevant local planning and neighbourhood planning policies and should be read in conjunction with **5.7 Policy Compliance Document [APP-086]** which sets out an analysis of the compliance of the Project with the specific relevant policies.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Ardleigh Parish Council and Little Bromley Parish Council Whilst the ALBA is not in the list of locations identified by the ExA for this question, the Parish Councils consider that, given the proximity of ALBA to the Dedham Vale National Landscape ("DVNL"), it too should be considered. The Parish Councils have raised in submissions to the Applicant that Holford Rule 1 has been breached in several respects: The ALBA is close to the DVNL and the proposed Pylons and Substations in Ardleigh are within 1.5km of the DVNL and clearly damage the setting of the National Landscape Ardleigh like Dedham has many listed buildings, (72) and a designated Conservation Area which are regarded as of high amenity value. They will be severely compromised by the route of the proposed development Ardleigh has a Scheduled Monument which is adjacent to the proposed development's route. Its setting will be badly affected, and there is a high risk that archaeology, which is known to be on the route of the pylons, will be lost. In relation to Holford Rule 4 "Choose tree and hill backgrounds in preference to sky backgrounds, wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees." has clearly been breached. The ALBA lies on a flat plain of largely agricultural land with very little tree cover. It is not possible for the proposed development as currently designed to comply with Rule 4.	As set out above, the Applicant disagrees that Holford Rule 1 has been breached and in contrast considers it appropriately applied. The inference of the wording regarding Rule 4 is that a route or site is only acceptable if it complies with all Rules. This is not the way that they have been framed with reference to caveats and non-absolute terms such as 'as far as possible' and 'prefer' reinforcing their role as guidance to inform balanced decision making. The Applicant notes and is aware of the position of Ardleigh Parish Council and Little Bromley Parish Council and has responded to such concerns raised by the parish councils in the following previous submissions: • **8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]** • Section 2.3 (Ardleigh Parish Council) and Section 2.37 (Little Bromley Parish Council) of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**
			North-West and South-West of Chelmsford Parishes Group Rule 1 – re: Great and Little Waltham 1. The ExA has asked the Applicant to set out how Holford Rule 1 has been used to design the route, specifically in relation to 4 locations, including the above. The Parishes Group agrees that this is a very pertinent question. 2. The Group believes it is also relevant to Holford Rule 2, particularly the note to Rule 2 which states: '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.'	As summarised in the introductory paragraph above, the Applicant disagrees with the North-West and South-West of Chelmsford Parishes Group and notes that Holford Rule 1 is not applicable to areas within Chelmsford crossed by the overhead alignment. The Applicant acknowledges the position of the North-West and South-West of Chelmsford Parishes Group and its continued preference for an alternative route they name 'Corridor L/Q' to which the Applicant has provided a response at previous deadlines and a further response at Deadline 4 in **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [Revision A]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			3. All of these features are present at the Walthams. The significant impacts of the Application upon them are outlined in the independent Landscape Report (Alison Farmer Associates) which is included in our **Written Representations [REP1-261]**. These are briefly summarised in para 2.3 of the Report as follows: – The high concentration of sensitive and valued assets within the Waltham area giving rise to effects which NG acknowledge would be significant adverse within approximately 1km for both heritage and landscape. – Other adverse effects in the Walthams area including impacts on churches and sense of place which are insufficiently considered to date. 4. The Parishes Group maintains that Holford Rules 1 and 2 have not been given sufficient weight by the Applicant in route selection, given the existence of alternatives such as the 'Corridor L/Q' route to the east and south of Chelmsford. 5. Whilst this alternative would also need to cross a conservation area (the Chelmer and Blackwater Navigation), it could be achieved with less adverse effect by replacing the existing 132kv distribution line with the new 440kv line. In so doing, it could be realigned to close parallel the existing 440kv line, with more coherent siting of pylons than at present, potentially leading to an improvement on the status quo. The guidance in Holford Rule 2 is to use route selection to 'minimise the effects' and the Parishes Group maintains that using this Corridor L/Q route would result in less effects than the Preferred Route. Rule 4 - re: Elevated land west of Broomfield 1. In DES1.6, the ExA also asks the Applicant to provide further information on the application of Rule 4 for the route of the proposed development, including details of where the route crosses ridge lines. The Parishes Group would like to draw the ExA's attention to an example within the area that it covers – elevated land west of Broomfield known as the Pleshey Farmland Plateau. 2. Given the general topography of Essex, it may be ambitious to identify 'ridges' in the same sense as in mountainous terrain. However, the key point of Holford Rules 4 and 5 is to avoid setting OHL and pylons against the skyline where the full extent of the structure is visible. The Preferred Route clearly fails to avoid this effect in this section of OHL.	The Applicant refers also to its previous responses to North-West and South-West of Chelmsford Parishes Group: • Section 2.45 of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]** • Page 277 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**. In summary, the Applicant's position on the Parishes response remains that it has routed and sited the alignment in accordance with the Holford Rules, as well as taking cognisance of the results of survey information and consultation feedback to make an appropriate and balanced decision reflecting its duties under NPS EN-1, EN-5 and the Electricity Act 1989. We note the Parishes Group position but also note that the alternative proposed by the Group, if it could be delivered, is not devoid of effects. Of course the locations identified by the Parishes Group to be avoided would see reduced effects, but these would transfer to receptors within any alternative environment and would incur other factors/aspects (such as increased cost) and present a different balance. The Applicant also takes the position that the suggested alternative via corridors L and Q is not achievable, a change is not required to be consistent with policy, nor is there any requirement to take forward a better or the best scheme at a location.

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			3. Map A *[see document]* indicates the change in topography in Broomfield, with land rising relatively quickly from the Chelmer Valley to the Pleshey Farmland Plateau. It shows the Preferred Route for OHL and pylons on the highest land where they would be highly visible, set against the skyline, when viewed from the valley slopes below. These include a range of receptors – in the village of Broomfield, Broomfield Hospital, the busy B1008 and people using the extensive network of mainly east/west footpaths. 4. Holford Rule 4 states: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and the Notes on Rules 4 and 5 state: Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints. 5. The following map *[see document* shows the topography of the wider Chelmsford area. It shows the Preferred Route (ET1) and the alternative 'Corridor L/Q' route to the east and south of Chelmsford. Broadly this is the alternative route proposed by Parishes Group in its representations. This illustrates how the Preferred Route generally follows more elevated land to the north and west of Chelmsford, cutting across intervening valleys. By contrast, a significant section of the Corridor L/Q Route lies on the lowest land in the area, with Danbury Hill and Little Baddow ridge set behind it when viewed from Chelmsford and the A12. Other sections follow a dip in the land between Galleywood and Stock. The overall effect tends to obscure the lower sections of pylons against a wooded backdrop. 6. Conclusion It seems clear that the correct application of Holford Rules 4 and 5 would lead to the preference of the Corridor L/Q route (ET5) as opposed to route north and west of Chelmsford that is proposed in the Application. Further information is contained in para **4.2.3 of the Explanatory Paper within our written representation [REP1-261]**	
DES 1.7	The applicant North Falls offshore wind farm Five Estuaries offshore wind farm	**Horlock Rules – North Falls and Five Estuaries** Were the Horlock rules applied to the proposed substations for North Falls and Five Estuaries? Do they take account of cumulative effects, and if so, explain how.	**Ardleigh Parish Council and Little Bromley Parish Council** In the Parish Councils' view the Horlock Rules have been breached in relation to the EACN as has been explained in previous submissions. The same applies to Five Estuaries, the National Falls substations and the expected Tarchon interconnector. Due to the nature of the landscape, as explained above, there is no acceptable way to hide structures of this size in such a flat landscape.	The Applicant disagrees with this statement, as confirmed through its own response to DES 1.7 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant refers to the response from Five Estuaries Offshore Wind Farm Limited below which further concurs with the Applicant.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Five Estuaries Offshore Wind Farm Limited National Grid's Guidelines on Substation Siting and Design (The Horlock Rules) were taken into consideration by Five Estuaries in identifying the most appropriate location to site its onshore substation. These guidelines document National Grid's best practice for the consideration of relevant constraints associated with the siting of electricity network infrastructure, including design, local context and land use, amenity, and line entry. These guidelines also confirm that consideration must be given to environmental issues at the earliest stage in order to keep adverse effects to a reasonably practical minimum in the planning of new substations. Table 4.4 in 6.1.4 Site Selection and Alternatives of the Five Estuaries' application documents summarises the Horlock Rules, (National Grid, 2003), and the project's approach to them.	The Applicant is in agreement with this response.
DES 1.8	The applicant	**EACN** The ExA note the details of the discussions between the proposed development and the two offshore wind farms of Five Estuaries and North Falls, specifically the details within the **Interrelationship Report [REP1-134]**. This states that the projects are liaising to ensure compatibility with landscape mitigation. Provide a plan showing the three proposed substations and combined planting proposals at this stage and state how good design will be provided for cumulatively. Include the Tarchon Interconnector in the same plan or provide justification for not doing so. You may wish to combine your answer with your answer to question GEN1.14. In addition to the above, explain how the design of the EACN would be consistent with Paragraphs 4.7.5 & 4.7.6 of NPS EN-1, especially in the light of Essex CC's comment '…opportunity exists to ensure the appearance of any substantial structures across the proposal… are appropriate for the locations through innovative design and approach to external appearance." ([RR-1083], paragraph 6.4.3). Also please explain how noise mitigation is to be incorporated into the proposed design of the EACN.	**Ardleigh Parish Council and Little Bromley Parish Council** Again, this is an issue concerning the Applicant assessment of, and explanation of how it has assessed, cumulative impacts. The Applicant has, in the past, refused to produce maps which show the cumulative effect of locating so many major projects in the ALBA. As in DES 1.7 it is not possible to use screening and planting to disguise structures of this size. The fact there could be 4 major structures plus pylons shows how little regard has been applied to EN 1 paras 4.75 & 4.76. In respect of understanding cumulative impacts, the Parish Councils have been forced to do their own mapping, which shows, even before Tarchon inclusion, an area of ~180Ha , 80% of which is Grade 1 farmland, is expected to be lost from the ALBA for substations and transmission infrastructure Again, the Parish Councils await the Applicant's response to this question with interest. The Parish Councils have had no direct communication from the Applicant regarding their representations concerning site selection and alternative route options. Some alterations appear to have been made without consultation with the Interested Parties. The Parish Councils also highlight once again that the Applicant refused offers to come to the area to present their ideas and meet with locals despite the availability of Ardleigh village hall with a maximum capacity of 150, where the level of engagement by residents has seen the hall full to	See response and requested plan provided within Appendix A of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. National Grid has carried out multiple rounds of consultation since 2022, considering feedback and refining our proposals at each stage. Throughout, our approach to consultation has fully complied with both statutory requirements and the statutory guidance on consultation relevant to applications for development consent (which has been developed by Government and the Planning Inspectorate in accordance with the Gunning Principles). The compliance of the consultation with relevant regulations and guidance is set out in **5.1 Consultation Report [APP-066]**, whilst specific consideration to the Gunning Principles is provided in **5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007]**. Our job is to carefully consider the most feasible options and present proposals for public consultation. At each stage of consultation, we have laid out our consideration of the alternative route options and technologies. All feedback received at each stage of consultation has been considered by the Project team and, where appropriate, we have amended our proposals in response. The proposals that we have chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by NPS EN-1 and EN-5. With respect to Point 42 put forward within Ardleigh Parish Council and Little Bromley Parish Council's response, the

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			capacity on several occasions when presentations have been arranged by APC about the proposed development. Alternatives have not been considered for the permanent access route from the centre of Little Bromley to the EACN, nor for mitigating the clear breaches of Horlock & Holford rules regarding route deviation to the EACN and the significant harms caused. Nor has any further consideration been given to use of Boxted Airfield as an alternative, more western siting of EACN.	Applicant notes that alternative access arrangements considered for the proposed new EACN Substation are set out under Table 3.19 within **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. As stated within paragraph 3.8.15 within the same document, the proposed access route via Bentley Road was found to represent the preferred alternative on the basis that it provided optimal environmental balance by utilising existing highway infrastructure and minimising additional land take requirements.
DES 1.9	The applicant All local authorities	**Lighting of new and upgraded substations** The ExA notes the rural context of the proposed EACN substation and notes that there is limited detail in relation to operational lighting in relation to this and other upgraded substations in the **Design Approach for Site Specific Infrastructure (DASSI) [APP-354]**. • Provide additional detail in terms of the height and type of any lighting installations and light contour plans. • Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Affected Local Authorities may also like to comment.	**Essex County Council** ECC supports the concerns raised by the ExA regarding the absence of detail for the design of the new / upgraded substations including that relating to operational lighting. The EACN is situated in a rural location; one that is largely characterised by an open and flat landscape. There is therefore, potential for operational lighting to have a significant and invasive presence in this rural landscape if not appropriately controlled. Given the current uncertainty regarding the detailed design and appearance for the EACN, ECC would be open to a Requirement which could be integrated into a design requirement so that details can be submitted as one to the relevant authority for approval. In respect of lighting of new and upgraded substations, ECC recommends that The Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting at Night should be a steering document for the substation's lighting design (Appendix B). The lighting assessment must include detail of how the proposed lighting will be energy efficient and dark sky compliant. ECC would request the inclusion of the following details: • Luminaires • mounting heights • beam angles • light spill • times of operation (timer or motion-sensor activated) **Braintree District Council** The Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting At Night should be a steering document for the substation's lighting design. In particular, lighting should only be sensor activated and not a permanent fixture in what generally speaking is an otherwise dark rural landscape.	Adherence to commitment B06 in **7.2 Outline Code of Construction Practice [Revision D]**, which is secured under Requirement 4 of **3.1 Draft Development Consent Order [Revision D]**, already ensures that the lighting associated with the Project, including at the proposed new EACN Substation, would be sensitive to bats and the rural location. Commitment B06 in **7.2 Outline Code of Construction Practice [Revision D]** states the following: '*All lighting (i.e., construction and operation (and maintenance)) will also be designed following the joint guidance provided by the Institution of Lighting Professionals and Bat Conservation Trust (2023). The lighting design will account for the potential effects on ecology by taking measures to minimise lighting usage, minimise light spill, use most appropriate wavelengths of light and locate lighting in the most appropriate locations to decrease the potential displacement effects on the natural environment and light sensitive fauna such as bats*.' Light Lux Plot Contour Plans will be included in the revised **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]**. Indicative lux plot plans for the substations depict the maximum 1 lux light spill outside the boundary fenceline.

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			Colchester City Council CCC agree sufficient detail pertaining to lighting is needed due to the scale of the EACN and the distance from the Dedham Vale National Landscape as darks skies are an important feature of the NL. The scale of the EACN has the potential to cause significant light glow if illuminated. The Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting At Night should be a steering document for the substation's lighting design. **Babergh and Mid Suffolk District Council** Light pollution impact complaints have previously been reported in relation to Bramford substation and so are likely to be of concern for the works to / around the substation as well as for the EACN. BMSDC have already raised concerns regarding the potential impact of the EACN on the setting of the National Landscape (please refer to the joint BMSDC SCC LIR document ref 1-178). It is noted that the Dedham Vale society is currently seeking Dark Sky Reserve status and that the National Landscape team have published lighting guidance for both the Dedham Vale and Coast & Heaths National Landscapes. BMSDC would expect to see further information regarding lighting proposals and impacts. The Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting At Night should be a guiding document for the substation's lighting design. **Thurrock Council** Details of the proposed lighting have been proved in the Project Description (Environmental Statement Chapter 4) and indicated that lighting would not be on by default. A nighttime assessment of the effects of operational lighting on character or visual amenity may not be necessary if the lighting is only on infrequently, however this is required to be confirmed. **Suffolk County Council** As the EACN is located in Essex, SCC defers to the Essex Councils. As a matter of principle, SCC considers that external lighting schemes for the operational phase of substations, as well as CSE compounds, should be submitted to and approved by the relevant local planning authority, as with any Town and Country Planning Act 1990 application.	Adherence to commitment B06 in **7.2 Outline Code of Construction Practice [Revision D]**, secured via Requirement 4 of **3.1 Draft Development Consent Order [Revision D]**, already ensures that the lighting associated with the Project, including at the proposed new EACN Substation, would be sensitive to bats and the rural location. During normal operational conditions, all National Grid substations are typically unmanned, therefore the use of the substation lighting on substation buildings or high voltage compounds during the evening or night-time is limited to fault response activities by the call out engineers or security call outs when the security team or police respond to a security alarm; in all other circumstances the substation lighting is off, outside of working hours. With regard to night-time effects on Dedham Vale National Landscape, the key parameters and assumptions for the landscape and visual assessment are set out in paragraph 13.4.20 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The use of operational lighting associated with the EACN would be limited to fault response activities or security call outs, and the default position would be for lighting to be off. No assessment of operational lighting on landscape and visual receptors was therefore undertaken, due to the limited potential for significant effects. Lighting during construction is considered in the landscape and visual assessment in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** and **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]**.

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			SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to Bramford Substation.	
			Tendring District Council TDC supports the ExA's request for detailed information on the height, type, and specification of all lighting installations at the EACN site, together with lighting contour plans and a full nighttime assessment of operational lighting effects on landscape character, visual amenity, and ecology. TDC has consistently highlighted the highly rural and sensitive nature of the EACN location and maintains that this siting is inappropriate, not least due to the significant potential lighting impacts and associated cumulative harms. To date, NG has not engaged directly with TDC on enabling the relevant planning authority to approve the operational lighting details for the EACN. However, NG has recently (20 March 2026) approached TDC to initiate discussions on entering into a post DCO Planning Performance Agreement. TDC is hopeful that such discussions will provide a route for appropriately securing approval of operational lighting details. Notwithstanding this, TDC's detailed objections to the EACN remain unchanged. These concerns relate to the site selection process, which TDC continues to view as predetermined and insufficiently evidenced, and to the ongoing absence of operational lighting information, which TDC considers likely to result in unacceptable levels of local and National Landscape harm.	
DES 1.10	The applicant	**T-pylons (1)** The ExA note that in **[REP1-069]** you imply that it is technically possible to use T-pylons in combination with standard steel lattice pylons, and whilst you have discounted their use, the ExA wish to explore this further: Therefore, please explain: How the eight areas assessed were chosen and why other areas were not; what was the criteria for choosing these sections of the route for consideration and were any other stretches of the route considered for their use, and if not, why not? Were they considered for the area around Ingatestone, and if not, why not? Whether the use of both pylon types would be a simple hybrid solution or whether additional infrastructure is required between the two types of pylons. If additional transition infrastructure is required, explain what this is and provide plans showing the appearance	**Chelmsford City Council** CCC reiterates its preference for the use of T pylons within the Waltham Gap as stated within its Local Impact Report REP1-153. The gap between Great and Little Waltham was not considered in detail for the use of T pylons, despite CCC requesting further consideration of the matter. The gap between Great and Little Waltham could reasonably considered to comprise a short straight area of overhead line. Aesthetically there is preference for its simplistic style and reduced permanent footprint. The height of the T pylon is comparable to the height of the proposed low height pylon and its width is narrower. In design terms, the T pylon structure would appear less bulky and squat and CCC would prefer this design approach to be used. There would be no material changes in construction methods. Despite requesting further details, CCC has not	The Applicant disagrees with the conclusions drawn by CCC and considers that the low height lattice pylons will be less visible both in summer and winter conditions than the T-pylons. The T-pylons will appear starkly through the filtered views against a grass or wooded backdrop. The Applicant's position is set out at paragraphs 2.5.9 to 2.5.11 of **5.15 Design Development Report [APP-122]** and demonstrates how pylon type has been considered as part of the mitigation hierarchy. **5.15 Design Development Report [APP-122]** explains the context within which T-pylons need to be considered, including Ofgem considerations. It also explains that T-pylons are less adaptable to varied terrains and require more substantial access infrastructure and that attention needs to be given to the transitions between pylon types. As such, **5.15 Design Development Report [APP-122]** confirms that it was concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst

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		of these structures and where they would need to be located for each transition. Are there any technical constraints to a more recessive colour being used (noting that they are generally light grey). In addition, provide visualisations to support your claim that T-pylons would not mitigate landscape and visual effects. Use some of the following VP's to illustrate this (worst-case scenario examples): 1.07 to 1.12; 1.14, 1.15, 2.06 to 2.12; 5.04, 5.05, 6.13 to 6.16; 7.08, 7.09, 7.12	been provided with drawings to show how permanent accesses could be provided to each T pylon. Further design review of such approach would be required, plus potential for mitigation. On balance, the operational access constraints of the use of T pylons may be outweighed by the visual impact benefits of the proposal and lessened potential impact on heritage and conservation. In the case of the Waltham's, the concern here is the impact upon local views and the setting of the listed buildings and conservation area. The simplistic architectural design of the T pylon is preferable. CCC would be happy to work with the Applicant to deliver the use of T pylons with the Waltham gap if the ExA feel this is appropriate. CCC suggest that a planning requirement relating to the introduction of T pylons would be an appropriate mechanism to secure this.	there may be some locations where there could be a design preference for T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not considered to be engaged and, accordingly, there is no justification for T-pylons to be used on the Project.
			Stephen Podd *[Note: this submission is referred to as responding to both DES1.10 and DES 1.11, however it is not duplicated in this document for ease of reference].* NG Comments about aesthetic/visual redesign of pylons NG state that "*The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that whilst T-Pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low- height lattice pylon design. T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used.*" I put the cost figures quoted by NG above to the Danish company (Bystrup – contact details sent separately to the	The Applicant's costs are set out Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357] pages D1-D14**, which presents the costs, based on a transparent economic appraisal. The cost comparison set out in the introduction would have been based upon the only T-pylon construction in the UK compared with the conventional lattice pylons used on the same route. 1. Both T-pylons and lattice pylons have a structure design life of 80 years, as set out in paragraph 1.2.11 (Page C4) of 7.19 2023 - Strategic Options Backcheck and Review [APP-357]. The lifetime costs have not included wayleave or easement costs. However, wayleaves are determined by the conductor oversail arrangements which need the wayleave right. As such the T-pylon, due to its conductor arrangement of diamond configuration, is wider than a conventional lattice vertical arrangement. This means the T-pylon therefore needs a wider wayleave despite the tower itself being narrower. There would be no difference in the wayleave cost, and certainly not significant compared to the capital cost, lifetime maintenance or lifetime loss cost which makes up the cost estimate. The higher wayleave costs of the T-pylon would not outweigh the costs indicated above. 2. The Applicant does not consider that compensation is fundamentally different in structure between lattice pylons and T-pylons. In both cases, compensation is assessed in accordance with the statutory Compensation Code, on a land-by-land basis,

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			Inspectorate) which designs T-pylons. The response from the designer was: *"Regarding the construction costs of a T-pylon – we find the mentioned costs very high. The reason might be that the structural design, and the foundation of the T-pylons hasn´t been optimized. We have - in a meeting with National Grid – about a year ago, - proposed to make an optimization of the total structure – unfortunately without luck. If we compare the lattice pylon with the Danish T-pylon – the Eagle pylon – then the cost of the Eagle will be around 1.7 times more – than a standard lattice tower. But please note that this is just a part of the total cost. The Eagle pylon has a small footprint – Ø 200 cm – which demands more steel in the structure – but it opens up for a fast foundation of the tower, without the additional costs of excavation and casting. Lifetime maintenance cost ifor the Eagle pylons is very low, due to a coating process, that is developed with Hempel. It is designed to last for 80 years."* Given the conflicting information about the comparative costs, NG need to be asked the following questions: 1. Have long-term wayleave costs been included in their overall costings, or are NG simply looking at construction and maintenance costs? Given that T-pylons are designed to last for 80 years, and that the current wayleave for a lattice pylon is considerably higher than for a T-pylon (much greater area required for a lattice pylon's four legs), has the greater wayleave cost over a period of up to 80 years been factored in to NG's costings? Do the comparative costs include a hypothetical inflation figure over that period? 2. Presumably the higher wayleave costs for a lattice pylon include an element for lost cropping area and therefore lost income for farmers. But do those costs also include management of the area beneath a lattice pylon? In my own farming experience (over 20 years working on clayland farms in Suffolk) lattice pylon base-areas quickly become a source of weeds, including noxious weeds such as Broad-leaved Dock, Curled Dock, Spear Thistle, Creeping Thistle and Ragwort which have to be controlled by law (Weeds Act 1959). This means time and cost for farmers – or does NG pick up that cost? 3. Does the wayleave cost include a payment for extra time needed during field operations to negotiate round lattice pylons with farm machinery – everything from initial ploughing through to combining? Each individual lattice pylon needs a separate 'headland' for all arable	reflecting the actual impact on the particular holding rather than the infrastructure type in isolation. 3. The Applicant acknowledges that the presence of permanent infrastructure, including lattice pylons, may give rise to ongoing land management considerations, including vegetation control beneath pylon structures. While weed control and ongoing land management are recognised considerations, these are not treated as a fixed, standardised allowance within easement payments. Instead, where additional costs arise as a direct consequence of the infrastructure, they are appropriately addressed through site-specific compensation in accordance with the statutory framework. 4. Due to the construction of a T-pylon being a non-climbing structure and the size of foundations required to manage the forces, T-pylons require sizeable foundations and require hard standing for Mobile Elevating Work Platform (MEWP) access to be maintained for maintenance purposes. Overall different but similar issues will arise when maintaining the area around the pylon that will have similar if not identical impacts for farming. 5. The unit cost set out in Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] pages D1-D14 does include the cost of installation including average reinstatement of ground conditions. Again, a lattice pylon is lighter with its load spread evenly across four smaller footings, whereas a T-pylon requires a larger more substantial foundation of different types depending on the ground conditions. The effects of each are manageable and would not affect the overall cost or ability to reinstate land to a similar if not equal condition. 6. The Applicant, as set out in the response above, considers T-pylons as part of the mitigation hierarchy (given the increased costs of T-pylons). This requires lattice designs to be considered unacceptable in planning policy terms before considering whether there is consideration of the use of T-pylon. The Applicant also disagrees with the statement on varied terrain and access infrastructure, as confirmed through the response to DES 1.10 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. The smaller footprint of T-pylons produces larger overturning moments reactions transmitted through the structure shaft onto the foundation. This translates to typically 5-10x greater foundation volume of concrete per pylon, thus higher vehicle delivery quantities will be required

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			operations. By comparison, T-pylons have a small footprint, and (depending where they are and how they align in a field) can be used as a baseline for setting up tramlines for spraying etc, enabling machinery to pass them with a minimum of deviation and without stopping. That is not always possible, of course, but making a circle around a T-pylon – just as currently around wooden electricity / telephone poles where they do not fit in with tramlines – is relatively quick and easy compared to negotiating a lattice pylon headland. 4. Do NG's costings include the not-insignificant cost of reinstating land drains interrupted or damaged by pylon construction? Clearly the risk is far greater where four foundations are needed (lattice pylon) rather than one (T-pylon). Good underdrainage is a critical factor for farming clay soils (Norwich to Tilbury is largely over clay soils). 5. In relation to NG's comment that "T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure", this argument has already been refuted by the T-pylon designers and was highlighted in my last submission (email correspondence available if you wish to see it). The Norwich – Tilbury route is not "varied", and T-pylons would require no "substantial access infrastructure"; in fact, lattice pylons probably need more, taking several days to construct, whereas a T-pylon can be erected in a single day. It is readily acknowledged that T-pylons use more steel, but they use much less concrete (which has its own 'carbon intensity'). Bystrup have given me permission to release all my email correspondence with them to the Inquiry.	to transport steel and concrete materials to pylon sites. Future access using conventional methods such as climbing would not be possible – MEWPs and subsequent access tracks would be required to access any overhead line components for repair and/or replacement.
DES 1.11	The applicant	**T-pylons (2)** Provide further information on the decision to not utilise T-pylons. Specifically: It is stated that Ofgem funding requires that the lowest cost acceptable design is taken forward rather than a more expensive design even if that design is perceived to reduce the level of effect. What and who defines 'acceptable' in this context? • The list of advantages of T-pylons does not include design benefits. Is there any evidence that the design of T-pylons is preferred in general to that of standard lattice pylons? • Does the single construction/anchoring point of T-pylons have land use benefits?	**Chelmsford City Council** CCC considers that T pylons offer an opportunity to reduce the level of effect of the project and this should take precedence over any costing. The cost of a proposal is not a material planning consideration. CCC refers to its case for the use of T pylons as set out in its LIR REP1 -153. CCC reiterates that it prefers the use of T pylons and considers them to be a design benefit.	The Applicant provided a response to points raised in Local Impact Reports regarding T-pylons on page 15 and in paragraphs 3.9.24 to 3.9.32 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		• How has the reduced construction time and reduced footprint of T-pylons been assessed in the cost/benefit exercise?		
DES 1.12	Tendring DC Essex CC	**Effectiveness of mitigation - EACN** Are the relevant local authorities (Essex CC and Tendring DC) satisfied that the applicant's approach to mitigating the adverse effects of the EACN in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome? In responding to this question, you may also wish to consider other matters that could potentially influence design, such as noise effects for example. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.	**Essex County Council** ECC considers the Applicant's proposed approach to mitigating the adverse landscape and visual effects of the EACN is not effective. The ExA's question relates specifically to the EACN, which it is ECC considered, would results in significant visual harm. ECC would additionally highlight the impact from the in combination effects arising from the presence of infrastructure relating to North Falls, Five Estuaries and the likely Tarchon Interconnector, that all accentuate the need for mitigation in the wider landscape. Effectiveness of Proposed Mitigation While the Applicant's proposals are comprehensive involving belts of new planting and earth sited both adjacent to and at distance from the EACN, such planting would only ever provide partial screening. This is due to the exceptional size, height, and horizontal spread of the EACN and associated fringe and linear (i.e. Pylons) infrastructure. ECC supports Tendring District Council's (TDC) view that no realistic level of planting or bunding could successfully mitigate the resulting landscape and visual harm, either within the local area or across the wider landscape. ECC believes that to fully understand the effectiveness of mitigation, the EACN should be reviewed through a standalone LVIA. Furthermore, once the visual impact has been review, an environmental colour assessment (ECA) should inform a comprehensive Design Code, addressing planting and materiality appropriately. Constraints on Mitigation Delivery The Applicant's chosen location for the EACN is heavily constrained by an established network of narrow rural single country lanes, field boundaries, and Public Rights of Way, which permanently divide the landscape into organic agricultural fields and other typical undeveloped countryside uses (such as horse grazing etc). While it is accepted some planting near these lanes and PROWs could reduce the visibility of lower elements of the infrastructure, significant and harmful views would always remain including from medium and long distance viewpoints. This impact is from all directions including from the north, northwest, and northeast, in and from the direction of the nearby National Landscape and its setting, where this development and all the associated infrastructure will be spread across large swathes of	Visual considerations formed an important part of the decision to adopt Air Insulated Switchgear (AIS) technology at the EACN. AIS avoids a large Gas Insulated Switchgear (GIS) building, reduces massing and height, and provides a more open arrangement that is significantly easier to filter in views from surrounding areas. The lower vertical profile of the AIS plant (approximately 12.5 m) with no large scale buildings will reduce the visibility of structures with mitigation through a mosaic of habitat types including woodland belts and landform bunding. The Applicant responded to comments on the assessment of effects of the Project, including the EACN in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (Essex County Council 4.10. LIR ID 25, 4.10.26 and 4.10.27 and also Tendring District Council LIR ID 20.5 & 20.6). The Applicant notes that similar matters included this response have been previously raised by Essex County Council **[REP2-036]** and Tendring District Council **[REP2-041]**. The Applicant's previous responses are set out in **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**. The Applicant does not consider it appropriate to include a Design Code for operational equipment. However, the Applicant is committed towards securing good design, and will confirm the governance and assurance process including design review at the detailed design stage in the Design Champion Brief to be included within **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** to be updated at Deadline 5. The Applicant has engaged with other developers who are proposing developments in proximity of the Project, to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. Consideration has been given to these projects when preparing the Environmental Area around the EACN Substation. The latest version of the North Falls and Five

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			unspoiled countryside in the middle of agricultural heartland, would remain highly prominent. Furthermore, it is considered care must be taken to avoid creating continuous "green tunnels" along country lanes. While such planting might maximise screening, it would harmfully alter the character of these rural routes and diminish public enjoyment of the countryside. Residual Harm and Opportunities ECC considers that the landscape and visual harm arising from the EACN alone or in relation to the setting of the National Landscape, cannot be adequately mitigated through the measures currently proposed or through any foreseeable refinement of those measures. If, however, the Applicant were to commit to a comprehensively planned strategic, peninsula wide programme of hedgerow and woodland creation and a clear legally binding delivery mechanism covering all costs associated with this delivery and management, this could potentially deliver some broader landscape benefits. It must be stressed that this will not mitigate the harm as set out here and repeatedly set out in the County Council's LIR and RR. An expansion of vast woodland cover in appropriate areas, and the re-establishment of a more connected hedgerow network could, over time, positively contribute to the character of the wider Tendring peninsula. No such comprehensive proposals have yet been put forward, and therefore ECC is unable to attribute any meaningful mitigation value to such measures.	Estuaries Joint Substations Design Guide[2] illustrates the landscape and ecology masterplan for NF/FE alongside the Environmental Area proposals for the EACN in its figures 8.17 Landscape and Ecology Masterplan - Integration with Future Projects (PDF page 107) and 8.19 Landscape and Ecology Masterplan - Illustrative Integration with Future Projects (PDF page 110). The Applicant refers to **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]**, Table 3.1 Item 8 (Landscape and Visual Effects) Action No. 8.2e for latest position on landscape compensation particularly requests on comprehensively planned strategic hedgerow and woodland creation. The Applicant is, however, continuing to engage with Essex County Council and Tendring District Council to understand more specifically what is being requested and will provide a response at Deadline 5 as confirmed under Action No. 27 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]**.
			Tendring District Council TDC does not consider the Applicant's proposed approach to mitigating the adverse landscape and visual effects of the EACN to be effective. The ExA's question relates specifically to the EACN in isolation and does not seek views on the effectiveness of mitigating the compounded, in combination effects that would arise alongside the NF, FE substations and the likely Tarchon Interconnector. Even when considered alone, the EACN would generate significant and unmitigable landscape harm. Effectiveness of Proposed Mitigation While comprehensive, dense, and – where necessary – wide to very wide belts of new planting and earth bunding would be essential both adjacent to the EACN and at greater distances, such planting would only ever provide partial screening. Given the exceptional size, height, and	

[2] Five-Estuaries-and-North-Falls-Joint-Substations-Design-Guide-V2-_Phase-2.pdf

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			horizontal spread of the EACN and associated fringe and linear (i.e. Pylons) infrastructure, TDC's view is that no realistic level of planting or bunding could successfully mitigate the resulting landscape and visual harm, either within the local area or across the wider landscape. Constraints on Mitigation Delivery The Applicant's chosen location is heavily constrained by an established network of narrow rural single country lanes, field boundaries, and Public Rights of Way, which permanently subdivide the landscape in organic agricultural fields and other typical undeveloped countryside uses (such as horse grazing etc). While some planting near these lanes and PROWs could reduce visibility of lower elements of the infrastructure, significant and harmful views would always remain – including from medium and long distance viewpoints. This is from all direction including from the north, northwest, and northeast, in and from the direction of the nearby National Landscape and its setting, where this development and all the associated infrastructure that will follow and spread across large swathes of unspoiled countryside in the middle of TDC agricultural heartland, would remain highly prominent. Furthermore, care must be taken to avoid creating continuous "green tunnels" along country lanes. While such planting might maximise screening, it would harmfully alter the character of these rural routes and diminish public enjoyment of the countryside. Residual Harm and Opportunities TDC considers that the landscape and visual harm arising from the EACN – alone or in relation to the setting of the National Landscape – cannot be adequately mitigated through the measures currently proposed or through any foreseeable refinement of those measures. If, however, the Applicant were to commit to a comprehensively planned strategic, peninsula wide programme of hedgerow and woodland creation – and clear legally binding delivery mechanism covering ALL costs associated with this delivery, this could potentially deliver some broader landscape benefits – but we need to stress, this will not mitigate the harm as set out here and repeatedly set out in TDC's LIR and RR. An expansion of vast woodland cover in appropriate areas, and the reestablishment of a more connected hedgerow network	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			could, over time, positively contribute to the character of the wider Tendring peninsula. No such comprehensive proposals have yet been put forward, and therefore TDC is unable to attribute any meaningful mitigation value to such measures because it does not exist.	
DES 1.13	Thurrock BC	**Effectiveness of mitigation – Tilbury** Are you satisfied that the applicant's approach to mitigating the adverse effects of the Tilbury substation in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome? In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.	**Thurrock Council** The Council considers that the proposals are high level and the Council have been unable to find any supporting detailed text to explain the landscape strategy proposed other than the labels on the outline landscape proposals plan. Written text describing how the landscape proposals for both scenarios have been developed (in relation to the landscape character of the area and visual screening) is required to gain a clearer understanding of the reasoning behind the proposals shown. The landscape proposals with Lower Thames Crossing do not include the ancient woodland compensation planting areas that could still go ahead. They do not show the planting proposals associated with the Lower Thames Crossing. The Council considers that these should be shown on the plan to illustrate how the Tilbury North Substation proposals work in conjunction with the Lower Thames Crossing proposals and illustrate how green linkages across both schemes have been considered so it is clear how, combined, they fit into the existing landscape pattern. The woodland compensation planting associated with Lower Thames Crossing on the site of the Tilbury North Substation was described in the Lower Thames Crossing Environmental Statement – Chapter 7 – Landscape and Visual chapter as planting 'to replace lost features, aid visual screening and landscape integration'. The Council requires an explanation be provided to explain how the visual screening and landscape integration can still be achieved as intended for the Lower Thames Crossing if this woodland compensation planting is relocated. The Lower Thames Crossing woodland compensation planting created a green corridor linking proposed and existing woodland. The siting of the Tilbury North Substation breaks up this corridor. The proposed landscape scheme should maintain green corridor links between the north and south of the site and this should be demonstrated with the proposed planting. The Council would like the Applicant to explore the option of mitigation planting within the Order Limits to the south of the substation and pylons, in the space between High House Lane and Hoford Road. The visualisation from High House Lane (Viewpoint 8.05: PRoW east of	Landscape proposals within the Environmental Area at Tilbury North Substation are described in paragraphs 9.7.11 to 9.7.15 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. This includes consideration of options with and without the Lower Thames Crossing: • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (with Lower Thames Crossing) • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (without Lower Thames Crossing). Indicative landscape proposals for each of these areas are included in **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. In addition to the information set out in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** further information and visualisations of Tilbury North Substation and associated Environmental Area are included within **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** in which paragraphs 2.1.17 to 2.1.19 provide the landscape context of the substation location, and consideration of materials and colours of substation buildings are set out in paragraphs 5.2.27 to 5.2.32. Design principles for the Environmental Areas are also included in Section 5.3 of the DASSI **[Revision B]**. An updated landscape plan for the Environmental Areas around Tilbury North Substation and CSE compounds will be provided at Deadline 5. This update will reflect the Scenario B design. The updated plan will show the Norwich to Tilbury Environmental Area, as well as the reconfigured Lower Thames Crossing (LTC) ancient woodland and nitrogen deposition compensation planting areas as agreed with both Natural England and LTC. The Outline Landscape and Ecological Management Plan will also be updated to reflect the updated landscape proposals.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Chadwell St Mary (No 78)) shows views towards the proposals and mitigation planting in this area could soften those views of both Tilbury North Substation and Lower Thames Crossing. A footpath runs along the northern boundary of the substation site. No mitigation planting is shown to soften the effect of the substation on the views from this footpath and its landscape context. The Council request that this should be considered.	
DES 1.14	South Norfolk DC Norfolk CC	**Effectiveness of mitigation - Norwich** Are the relevant local authorities (South Norfolk DC and Norfolk CC) satisfied that the applicant's approach to mitigating the adverse effects of the Norwich Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome? In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.	**Norfolk County Council** NCC defer to South Norfolk District Council, which is leading on landscape impacts at Norwich Main. **South Norfolk District Council** SNDC notes that the Norwich Main Substation extension already benefits from standalone planning permission under the Town and Country Planning Act (ref: 2024/1336) and therefore does not form part of the development proposed for consent within this DCO. As such, opportunities to revisit or modify the design, layout, or landscape mitigation for this element are inherently limited and considered fall outside the scope of the Examination. SNDC does note that the land surrounding Norwich Main is currently proposed for BNG mitigation for other consented schemes and remain concerned that land within the Environmental Area around Norwich Main substation will be subject to future development pressures. No provision has been made to facilitate future connections within the landscaping plan so we foresee land upon which NG hope to deliver part of their BNG commitment being subject to ongoing disturbance which will compromise the quality of the habitats provided and make enforcement difficult. It is suggested that habitats within this area are not counted as part of the BNG commitment.	Land around Norwich Main Substation has been included within the Biodiversity Net Gain (BNG) Plan for the Town and Country Planning Act (ref: 2024/1336) consented scheme. This scheme considered the interaction with other known projects including Norwich to Tilbury to ensure overlaps were minimised and that 10% on-site BNG could be achieved. While every effort has been made to ensure no overlaps, if in future the areas need to be used for unexpected operational reasons then new planting would be provided or biodiversity units purchased based on the value that the habitats are targeted to achieve. This is in keeping with the requirements of the Environment Act 2021 for Town and Country Planning Act developments.
DES 1.15	Babergh DC Mid Suffolk DC Suffolk CC	**Effectiveness of mitigation - Bramford** Are the relevant local authorities (Babergh DC, Mid Suffolk DC, Suffolk CC) satisfied that the applicant's approach to mitigating the adverse effects of the Bramford Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome? In responding to this question, you may also wish to consider other matters that could potentially influence design.	**Babergh and Mid Suffolk District Council** BMSDC are seeking a strategic approach to appropriate mitigation of the cumulative effects of the project, together with Bramford to Twinstead and other development in the area, enabled by these network capacity developments. This strategic approach should be based on a survey of the landscape surrounding Bramford substation (3km radius suggested), identifying existing and proposed planting from other developments to focus planting mitigation in the most effective and efficient locations. The strategic approach should be holistic in nature and include consideration of public safety, amenity, the	The Applicant considers that appropriate embedded and standard mitigation has been provided and secured by the DCO. The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and provided a response in relation to the principle of the need for strategic masterplanning around Bramford in response to written question LV. 1.28 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Other IPs are also invited to respond to this question, if they wish to contribute to this topic.	resilience of the installations (including those of critical national infrastructure) in terms of safety from incident and provision of secondary access in an emergency, biodiversity and heritage. BMSDC note the applicant's commitment to work collaboratively with Bramford to Twinstead to deliver appropriate mitigation. The Councils look forward to engaging with the applicant and all other relevant stakeholders, including SCC, on this matter.	Notwithstanding this above position, the Applicant notes the council's comments and is currently engaging with Babergh District Council and Suffolk County Council in relation to this matter.
			Suffolk County Council SCC has commented in its Relevant Representation [RR-3520] and in its **Joint LIR [REP1-178]** and has underlined the need for strategic placemaking around the Bramford substation. While the proposed rationalisation (by undergrounding) of parts of the 132kV network is welcome, SCC considers that this does not go far enough. SCC considers that landscape scale restoration is required, which goes beyond reinstatement of vegetation, that is lost to the scheme, to actively seeking to enhance the landscape around Bramford and Burstall, through connecting habitats, reinstating historic field boundary patterns and providing effective screening and filtering from views from PROW and residential clusters. SCC considers that a Landscape Masterplan is required in this area. This should be informed by the Suffolk Local Nature Recovery Strategy and consider visual mitigation opportunities. The strategic approach should be holistic in nature and include consideration of public safety, amenity, the resilience of the installations (including those of critical national infrastructure) in terms of safety from incident and provision of secondary access in an emergency, biodiversity and heritage. SCC notes the Applicant's commitment to work collaboratively with Bramford to Twinstead to deliver appropriate mitigation. The Councils look forward to engaging with the applicant and all other relevant stakeholders, including BMSDC, on this matter.	The Applicant considers that appropriate embedded and standard mitigation has been provided and secured by the DCO. The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and provided a response in relation to the principle of the need for strategic masterplanning around Bramford in response to written question LV. 1.28 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Notwithstanding this above position, the Applicant notes the council's comments and is currently engaging with Suffolk County Council and Babergh District Council in relation to this matter.

4. Alternatives

Table 4.1 Alternatives

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
ALT 1.1	All local authorities	**Reasonable alternatives: policy and legislation** The local authorities are invited to comment on their understanding of 'reasonable alternatives' in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'. The local authorities are asked, where they have suggested alternatives, if they would meet the definition of reasonable alternatives in the context of the policy and the EIA Regulations. Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.	**Essex County Council** ECC acknowledges the invitation to review and comment on NPS EN-1 paragraphs 4.3.22 to 4.3.29 and the issue of the materiality in the consideration of any alternative. Paragraph 4.3.22 of the NPS is clear that the weight that can be given to those alternatives lies in the hands of the decision maker. The assessment of alternatives must be proportionate and only alternatives that meet the objectives of the proposed development need to be considered. The Applicant, at 4.4.25 in the 2024 update to the Strategic Options Backcheck and Review considered the ESO's East Anglian Network Study of March 2024. In ECC's opinion the Applicant scoped out alternatives set out in that report which by definition could have met the objectives of the proposed development. Instead, it only contains the Offshore 1 option but makes little refence to it. The reasonable alternatives that several local authorities and IP's cited from the ESO report and the applicants Offshore 1 do meet the tests for reasonable alternatives as set out in NPS EN-1 and the EIA Regulation as they derive from the Energy Systems Operator and the Applicant, and therefore by definition are reasonable. The ESO were careful to ensure that the number of alternatives they assessed were workable and deliverable, and at Paragraph 5 of that report (page 20), the ESO sets out the preliminary assessment of the options in order to ensure they are workable. At Table 4 on Page 21 the Gate 1 assessment details this. Therefore, the alternatives listed in the ESO report would meet the definition of 'reasonable alternatives', as would the applicant's Offshore 1. ECC notes Regulation 14(2)(d) and also Schedule 4 of the EIA Regs – but comment that alternatives must be assessed in a sufficient (but proportionate) way to allow meaningful comparison. However as expressed in Paragraphs 4.2.1 & 4.2.6 of its LIR (REP1-161) ECC from the outset of its engagement on this project, has raised an in principle objection throughout all stages of consultation as set out in ECC's relevant representation (RR-1083). ECC maintains a strong position that its preferred strategic option for meeting the need for	The Applicant acknowledges the position of the Local Planning Authorities, which is consistent with the position as stated by the authorities in earlier submissions and in their Local Impact Reports. The Applicant's position is that its consideration of alternatives in the development of the Project and as presented in the DCO application is compliant with relevant planning policy and the EIA Regulations. The Applicant has set out in detail its position on alternatives, including the Local Planning Authorities' preference for offshore options, at the following points of the Examination to date: • At Issue Specific Hearing 1 (ISH1), as summarised in Sections 2.2 and 3.2 (Action 8) of **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** • In Section 3.3 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant defined 'reasonable alternatives' in paragraphs 3.2.25 to 3.2.27 of **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]** and (as recognised by the ExA in ALT1.1), the inclusion of certain offshore cable options in ES Chapter 3 was on the basis of EIA scoping requirements and not because the Applicant considered them to be reasonable alternatives consistent with its definition. In summary therefore, the Applicant does not agree that offshore cable options as promoted by the Local Planning Authorities are reasonable alternatives and refers to its detailed responses in the documents referred to above. The applicant has considered the ESO report and previously published its response but does not agree that reasonable alternatives considered by a third party for the purpose of their own report constitute reasonable alternatives for the purposes of the assessment of the Project. The Applicant has considered this other work and established the basis to progress the Project and comprehensively set out why an onshore predominantly overhead line forms the basis for the Project. The Applicant's position, as reflected in updated Statements of Common Ground with various local

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			additional transmission capacity is that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines ("OHLs") and pylons along its entire length. ECC remains strongly of the view that a more sensitively designed scheme which minimises the predominant use of traditional overhead line technology, could deliver the best outcome for Essex in the interests of safeguarding the amenities of local communities and the environment Alternatives may be discounted where they are not NPS-compliant, not commercially viable, not physically suitable, or are too vague or immature. ECC's position is that, for the reasons given in ECC position is that for reasons given in part 4.2 of it's **Local Impact Report [REP1-161]**, the alternatives to which ECC draws attention are credible and so should be taken into account and are relevant to assessing whether development consent should be given. **Chelmsford City Council** **Colchester City Council** **Braintree District Council** **Tendring District Council** *[All parties provided identical or near-identical responses and are consolidated to aid legibility of this document]* The policy context for reasonable alternatives is set out at paragraphs 4.3.22 to 4.3.29 (not 4.3.19 which is presumably a typo) of NPS EN-1. Taking each NPS EN-1 paragraph at a time: Para 4.3.22 is clear that the weight that can be given to those alternatives lies in the hands of the decision maker. The assessment of alternatives must be proportionate and only alternatives that meet the need objectives of the proposed development need to be considered. Whilst at 4.4.25 the applicant notes the 2024 update to the Strategic Options Backcheck and Review considered the ESO's East Anglian Network Study of March 2024, it is CCC's opinion that the Applicant scoped out alternatives set out in that report which by definition could have met the objectives of the proposed development. Instead, it only contains the Offshore 1 option but makes little refence to it. Para 4.3.24 is only relevant to more discrete sites as it looks to retain them for future energy development. Para 4.3.25 serves to 'mop up' alternatives that the decision makers considers to be important and relevant and thus allows the decision maker to take into account	authorities submitted at Deadline 4, is that this is a matter that the Applicant and the local authorities are unlikely to reach agreement on.

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			the alternatives the Local Authorities and IP's have noted, namely those in the then Energy Systems Operator's (ESO's) East Anglian Network Study of March 2024, and the Offshore 1 option set out in the 2025 Strategic Options Backcheck and Review. Para 4.3.26 allows the decision maker to not take into consideration alternative schemes that would not comply with the relevant NPS. But that is not the case here as a number of the options in the aforementioned ESO report along with Offshore 1 could be delivered in a manner that meets the requirements of the NPS. Para 4.3.28 rules out vague and immature proposals. However, those noted in the ESO report of March 2023 were neither vague nor immature as by inclusion in that report they clearly are realistic options. The same is the case for Offshore 1. Para 4.3.29 sets out how it can be the responsibility of a third party to evidence the suitability of an alternative that is tabled once the application is made. That is not the case here as the applicant was in possession of the ESO's March 2024 report at PEIR stage well before formal submission. The reasonable alternatives that the Local Authorities and IP's cited from the ESO report and the Applicants Offshore 1 do meet the tests for reasonable alternatives as set out in NPS EN-1 and the EIA Regulation as they stemmed from the Energy Systems Operator of the day and the applicant, and by definition are reasonable. The ESO were careful to ensure that the number of alternatives they assessed were workable and deliverable and at Para 5 of that report (page 20) the ESO sets out the preliminary assessment of the options in order to ensure they are workable. At Table 4 on Page 21 the Gate 1 assessment details this. The alternatives listed in the ESO report would meet the definition of 'reasonable alternatives', as would the applicant's Offshore 1.	
			Brentwood Borough Council BBC understands that the ExA draws the Council's attention to NPS EN-1 paragraphs 4.3.22 to 4.3.29 – and the issue of the materiality in the consideration of any alternative (i.e. NPS EN-1 paras 4.3.25-4.3.29 inclusive). BBC note Regulation 14(2)(d) and also Schedule 4 of the EIA Regs – but comment that alternatives must be assessed in a sufficient (but proportionate) way to allow meaningful comparison.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			BBC repeats earlier comments/dissatisfaction that credible alternatives have been appropriately considered and assessed.	
			Babergh and Mid Suffolk District Council BMSDC have suggested alternatives and believe these do meet the definition of 'reasonable alternatives' as they would be capable of delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	
			Suffolk County Council SCC provided overarching comments on the policy approach to alternatives at section 5 of its Post Hearing Submissions following **ISH1 [REP1-177]**. Those comments are not repeated but are relevant to the response to this Question. SCC considers that the alternatives proposed to be reasonable as there is (as stated in NPS EN-1 paragraph 4.3.23) "a realistic prospect of the alternative delivering the same infrastructure capacity […] in the same timescale as the proposed development." Paragraph 4.3.24 cannot be sensibly applied to a linear project for a Grid reinforcement because there is no realistic prospect of other projects for 'energy infrastructure of the type proposed' coming forward in addition to the proposal. The siting and alignment of the proposal does need to consider whether other alignments (and siting for pylons and other components such as substation) would have fewer adverse impacts than what is currently proposed. Paragraph 4.3.25 allows for consideration of any alternatives that the decision makers consider to be important and relevant and thus allows the decision maker to take into account the alternatives that Interested Parties have proposed. Paragraph 4.3.29 sets out how it can be the responsibility of a third party to evidence the suitability of an alternative that is tabled once the application is made. That is not the case here as the Applicant was in possession of the ESO's March 2024 report at PEIR stage well before formal submission. SCC made specific reference to this report in its pre-application statutory consultation response. SCC also considers that with regard to the specific elements of the project which it considers should be refined or relocated (as set out in Chapter 13 of the **Joint Suffolk LIR [REP1-178]**, the alternatives put forward by	

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			SCC in the LIR and also as set out in section 5 of its Post Hearing Submissions following **ISH1 [REP1-177]** all constitute reasonable alternatives that the Applicant should address.	
			National Highways Lower Thames Crossing Project NH LTC's comments in relation to reasonable alternatives centre around the Applicant's siting process for the Tilbury North substation, and the proposed location for displaced Lower Thames Crossing mitigation / compensatory habitats. NH LTC does not consider it helpful to duplicate its concerns, which remain unchanged, and so for full details of its concerns refers the ExA to the SoCG between the Applicant and **NH LTC [REP1-075]**, particularly matters 3.2.12, 3.2.20, 3.2.23, 3.2.26 and 3.2.39.	The Applicant acknowledges the comments from NH LTC and provides an update on these matters in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [Revision B]** at Deadline 4.
ALT 1.2	All local authorities	**Approach to options appraisal** The local authorities are invited to review section 3.3 of ES chapter 3 **[APP-127]** and appendices 3.1 **[APP-128]** and 3.2 **[APP-129]** in respect of the applicant's approach to options appraisal, including the hierarchical assessment. They should provide comments where they disagree with any part of the approach (not the individual options considered; the approach only). This could form part of the SoCG.	**Braintree District Council** **Essex County Council** **Chelmsford City Council** **Babergh and Mid Suffolk District Council** **Colchester City Council** **Suffolk County Council** *[All parties provided identical or near-identical responses and are consolidated to aid legibility of this document, noted as [The Council]' in text]* Paragraph 4.3.23 of NPS EN-1 (2023) states that the Secretary of State (the decision maker) should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development (which in this case is 2030-2031). Paragraph 4.3.28 of NPS EN-1 (2023) states alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision. Paragraph 4.3.28 of NPS EN-1 (2023) also states that alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	The Applicant acknowledges the responses from the local authorities and has identified the following key themes within the responses provided. The Applicant comments on these in turn below. 1. Timescale of need for network reinforcement The Applicant acknowledges the position of the local authorities on this matter and in the context of the Hiorns Report which has been cited by the local authorities in previous representations, in which it is stated that the Project could be delayed to 2035, allowing for alternative options such as HVDC to be delivered. The Applicant refers to its earlier submissions in response to the Hiorns Report which expressly refutes this: • Page 21 and Appendix A (page 7) of **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** • Section 3.2 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant maintains a position that the need for the Project by 2030 remains urgent as independently evidenced through NESO Clean Power 2030 Annex 2[3]. 2. Alternative projects (offshore and HVDC undergrounding) The Applicant acknowledges the position of the local authorities that an entirely alternative scheme (offshore / HVDC) is their preferred strategic option and refers to its response to ALT1.1 above which deals with this matter.

[3] National Energy System Operator (NESO) (2024) *Clean Power 2030, Annex 2: Networks, Connections and network access analysis*.

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			The application includes an ES chapter specifically on 'alternatives' (APP-127). This chapter does not consider an exhaustive list of every theoretical alternative but focuses on so called "reasonable" alternatives consistent with Paragraph 4.3.22 of NPS EN-1 2023. The chapter clarifies that reasonable alternatives exclude "options with substantially different capacities, delivery timelines, or those that do not meet the Project's strategic objectives are not considered reasonable alternatives for the purposes of this chapter." Document APP-127 (Alternatives) sets out that all options are assessed against criteria including National Grid's statutory duties under the Electricity Act 1989 (including Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission, and Section 38 and Schedule 9, duties to preserve natural beauty and mitigate environmental effects), the industry-standard Holford Rules for overhead line routing and Horlock Rules for substation siting, and the then-current policy framework including the 2011 versions of National Policy Statements EN-1 and EN-5. As part of the initial assessment of the routing, the Applicant reportedly considered other available options including inter alia increasing operating voltage, Alternating Current (AC) underground cable for the whole route, Direct Current (DC) underground cable and Offshore connections. However, these other options were discounted at an early stage for various reasons, but predominantly due to higher costs (relative to traditional pylons with targeted undergrounding as currently proposed). *[The Council]* acknowledges that, in accordance with NPS EN1, any alternative schemes would need to be delivered within a similar timescale to the proposed development. However, this must also be considered against the timescale of the actual need for network reinforcement *[The Council]* also recognises that there are cost options associated with the alternative schemes. *[The Council]* considers that alternative schemes to the proposed lattice pylons scheme, such as off-shore and High Voltage Direct Current (HVDC) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme. *[The Council]* reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission	3. Appraisal methodology The purpose of a Preliminary Environmental Information Report (PEIR) is not to inform the acceptability of other alternative options; it is to provide an initial assessment of potential environmental effects and enable informed consultation during the pre-application period. Feedback on the PEIR is taken into account in further design development and environmental assessment, including identification and design of mitigation. More broadly the approach to options appraisal has been published and formed the basis for previous National Grid submissions tested over the yeras including recently on the approved Hinkley, Yorkshire Green and Bramford to Twinstead Projects. The Applicants position is that it is an appropriate basis for the development of the Project. 4. Use of Holford Rules Regardless of the respondents view on the Holford Rules, the relevant National Policy Statements forming the basis for the decision making n the Project expressly note at paragraph 2.9.16 of EN5 the need to embody the Holford Rules and is the approach adopted by the Applicant. Paragraph 2.9.16 of EN-5 recognises the importance of the guidelines provided in the Holford Rules. These guidelines, '*intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead lines*', including avoiding, if possible, areas of highest amenity value or scientific interest. A summary of the Holford Rules and how these have been considered on the Project are included in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]** and **5.6 Planning Statement [APP-085]**. Throughout the development of the Project, the Holford Rules have been considered in conjunction with information on the presence of constraints, homes and environmental features and the findings of the Environmental Impact Assessment process to inform balanced decision making, through which we define our proposals that are refined in response to feedback.

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			infrastructure and does not include overhead lines and pylons. *[The Council]* recognises that this option would need to be delivered in a timely manner, and without risk to national net zero, renewable energy generation and decarbonisation targets and energy security *[The Council]* further notes that the approach undertaken regarding Options Appraisal is mainly based on the Applicants guidelines, rather than a specific Government based appraisal method. Preliminary Environmental Impact Report (PEIR) or other early environmental appraisal tools were not used to help to inform the acceptability of other alternative options. The use of the Holford Rules raises concern. They are unadopted and out of date. They do not reflect up to date planning policy and do not allow for local distinctiveness. The reliance on national, as opposed to local designations, means that the Project does not allow for local distinctiveness, nor consideration of the cumulative effects of the siting pylons and OHL near a number of locally designated features within close proximity to each other. This approach goes against the grain of general planning policy where proposals are considered on a case by case basis according to the best fit for their location. Further commentary will be provided within the SoCG as required.	
			Brentwood Borough Council BBC acknowledges that, in accordance with NPS EN-1, any alternative schemes would need to be delivered within a similar timescale to the proposed development. However, this must also be considered against the timescale of the actual need for network reinforcement. BBC also recognises that there are cost options associated with the alternative schemes. BBC considers that alternative schemes to the proposed lattice pylons scheme, such as offshore and High Voltage Direct Current (HVDC) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme. BBC reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. BBC recognises that this option would need to be delivered in a timely manner, and without risk to national	

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			net zero, renewable energy generation and decarbonisation targets and energy security. BBC further notes that the approach undertaken regarding Options Appraisal is mainly based on the Applicant's guidelines, rather than a specific Government based appraisal method. Preliminary Environmental Impact Report (PEIR) or other early environmental appraisal tools were not used to help to inform the acceptability of other alternative options. The use of the Holford Rules raises concern. They are unadopted and out of date. They do not reflect up to date planning policy and do not allow for local distinctiveness. The reliance on national, as opposed to local designations, means that the proposals do not allow for local distinctiveness, nor consider the cumulative effects of the siting of a number of locally designated features within close proximity to each other. This approach goes against the grain of general planning policy where proposals are considered on a case-by-case basis according to the best fit for their location. Further commentary will be provided within the SoCG as required.	
			Norfolk County Council NCC confirms that it has reviewed the Strategic Options Backcheck and Review (SOBR) 2024, Appendix B, and the August 2025 update, alongside the applicant's alternatives assessments within ES Chapter 3 and the Design Development Report. These documents identify a series of environmental, technical and socio economic constraints associated with Offshore Option 1, including the requirement for a long offshore HVDC cable route, associated marine ecological considerations, and challenges relating to landfall and converter station siting at Tilbury amidst wider Freeport and port related development pressures. While NCC recognises these strategic level constraints, it also notes that the appraisal of Offshore 1 remains relatively high level, particularly when compared to the scale and permanence of the impacts that the proposed onshore overhead line would generate within Norfolk, including major residual landscape effects.	The Applicant remains of the view that as set out in the various SOBRs and at Issue Specific Hearing 1 , the cost differential to offshore alternatives is of such a scale that there is no legitimate reason to re-open this consideration (see **8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]).** Other constraints and factors are also relevant as set out in the response ALT1.3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
			Tendring District Council TDC has reviewed Section 3.3 of ES Chapter 3 (APP127) and Appendices 3.1 (APP128) and 3.2 (APP129) in respect of the applicant's approach to options appraisal and the hierarchical assessment. Our	The Applicant acknowledges the position of TDC and has responded to detailed comments on alternatives provided by TDC in their Relevant Representation within Appendix AD of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and in responses set out

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			comments relate solely to the approach, as requested by the ExA. TDC recognises that the assessment of alternatives must be undertaken within the framework of the relevant National Policy Statements, including NPS EN-1 (2023), which makes clear that alternatives should be realistic, deliverable within a similar timescale, and capable of meeting the Project's strategic objectives, including energy security and decarbonisation. TDC also acknowledges that alternatives which are not physically suitable, commercially viable, or sufficiently mature may be excluded from further consideration. However, the application of these policy tests depends fundamentally on transparency as to when alternatives were considered, what information was available at the time, and why particular options were discounted. It is this evidential and temporal clarity that remains absent from the Applicant's submissions. 1. ES Chapter 3, Section 3.3 (APP127) The ES states that "transparent methods were used to inform decision making, including technical inputs from engineers, planners and environmental consultants". While TDC welcomes this principle, we have repeatedly requested access to the actual evidence underpinning these claimed technical inputs. To date, NG has declined to share some of the most crucial of details, for example an unwillingness to disclose engineering constraints or environmental consultant inputs would not be "necessary or proportionate" (as referenced in NG's responses to RRs and LIRs). Without these underlying materials, TDC cannot verify the transparency or robustness of the approach described in Section 3.3. In short: the process, as described, appears sound in principle – but TDC has not been shown the evidence needed to confirm that it has actually been applied in practice, particularly in relation to the site selection for the EACN and in relation of pylons within the setting of the National Landscape as well as a reluctance towards altogether avoidance of the National Landscape. 2. Appendix 3.1 – Approach to Options Appraisal and Hierarchical Stages (APP128) TDC acknowledges that Appendix 3.1 sets out a structured, multistage appraisal process. However, our main concern is that the timing and evidence base for these stages remain unclear.	in Sections **3**.3, 3.4, and 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant also acknowledges the preference of TDC for an entirely alternative scheme (offshore / HVDC) as the preferred strategic option and refers to its response to ALT1.1 above which deals with this matter. In relation to the comments on specific documents: 1. ES Chapter 3, Section 3.3 (APP127) The Applicant remains of the view that the approach to assessing alternatives as set out in **7.17 Strategic Options Backcheck and Review [APP-355]** (Chapter 5 Strategic Option Overview summarises the options), **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** (entire chapter), and **5.15 Design Development Report [APP-122]** (Chapter 2 Project-Wide Considerations Relevant to Design Development), is robust and policy compliant. The evidence and key differences leading to decision making are presented in the various Design Development Reports. The Applicant has not completed full comparative assessments of each alternative when any such options can be removed from further consideration on the basis of certain critical factors. With regard to EACN location, routeing and siting decisions, including assessment of alternative options, are articulated clearly in **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** and the **2025, 2024 and 2023 Design Development Reports [APP-122, APP-359 and APP-358]**. 2. Appendix 3.1 – Approach to Options Appraisal and Hierarchical Stages (APP128) See the answer above. 3. Appendix 3.2 – Options Identification and Selection (APP129) The respondent is entitled to their view on alternative options, but the Applicant is also entitled to disagree. Changes have demonstrably been made to the Project design in terms of routes, sites and technology in response to feedback at each round of consultation. The fact that other changes preferred by others have not been made is based on evidence and clearly explained in various submission documents including the Design Development Reports (e.g. **5.15 Design Development Report [APP-122]**). The Applicant has previously responded to comments raised by TDC on alternatives in the Dedham Vale and wider Tendring area and in relation to the EACN,

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			TDC has asked NG to confirm: – When each stage was undertaken, especially Stages 2 and 3; – What information was available at the time of those decisions; – Which technical inputs were available at the time and used, and how they influenced the key and consequential decisions and outcomes; – Whether alternative broad corridors or substation locations (including locations outside the Tendring Peninsula) were genuinely assessed at the right stage in the process. This timing information is not a minor detail – in the context of the various impacts on TDC it is fundamental. It determines whether the options appraisal was truly openminded or whether key decisions (such as the EACN location and the arc of pylons around the north of Ardleigh) have already been constrained by early connection agreements dating from 2020/2021. At present, Appendix 3.1 reads well as a description of a good process – it is merely that. The bottom line is that TDC has not been provided with the underlying evidence showing that the stated approach was actually followed. Until that information is disclosed, TDC cannot endorse the approach as having been applied transparently or objectively. 3. Appendix 3.2 – Options Identification and Selection (APP129) TDC disagrees with the applicant's statements on page 11 regarding the role of consultation and how consultation feedback influenced the identification and selection of options. In particular, TDC has already demonstrated that: – Alternative locations that avoided the National Landscape (Dedham Vale), the wider Tendring Peninsula, or entirely different EACN locations were not genuinely considered, despite being technically plausible (as acknowledged by NG themselves); – The lack of clarity on the timing of option generation stages makes it appear that by the time consultation occurred, key decisions had already been shaped by earlier connection agreements, limiting the scope for meaningful change – this is clearly not an approach that TDC can ever agree with	including timing of the decision making, in Appendix AD of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and in Section 3.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant refers to those earlier responses and maintains its position that the options selection process and related consultation exercises are satisfactory. The Applicant's position, as reflected in updated Statements of Common Ground with various local authorities submitted at Deadline 4, is that this is a matter that the Applicant and the local authorities are unlikely to reach agreement on.

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			– As a result, consultation appears to have had little practical influence on the range of options considered or taken forward. – In summary: while Appendix 3.2 describes a process in which consultation can shape the location, design, and mitigation, the lived experience of TDC is that this did not occur in relation to the EACN or the routing across the Tendring Peninsula and within the setting of the National Landscape. TDC notes that the options appraisal appears to rely predominantly on applicant defined guidance and processes, rather than a clearly articulated, government endorsed appraisal methodology. In particular, it is unclear whether early environmental appraisal tools—such as a Preliminary Environmental Information Report or equivalent—were used at formative stages to inform the acceptability of alternative options before key strategic decisions were taken. While TDC recognises that considerations such as cost, technical feasibility, deliverability and programme are relevant in determining whether alternatives are reasonable, the absence of clear evidence demonstrating how these factors were applied at the appropriate stages limits confidence in the conclusions reached. TDC considers that alternative strategic solutions, including integrated offshore connections and high voltage direct current undergrounding, have not been explored in sufficient detail to demonstrate whether they could deliver improved environmental outcomes overall when assessed holistically against the submitted proposals, whilst still meeting the Project's strategic and policy objectives. Conclusion TDC supports the principles of a structured and transparent options appraisal approach. However, our position remains that the necessary technical evidence, timing information, and consultant inputs have not been provided, and therefore we cannot confirm that the approach, as described in the ES and appendices, was applied in practice. Until NG discloses the evidence requested – as set out in detail in TDC's LIR, RR, and this submission – the appraisal process reads as a highlevel narrative rather than a transparent, evidenced assessment of reasonable alternatives.	

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ALT 1.3	The applicant All local authorities	Strategic options: Offshore 1 Many of the local authorities and a large number of IPs have expressed that they would prefer the offshore option as an alternative to OHL infrastructure between Norwich and Tilbury. Could the local authorities please clarify if they have reviewed the strategic options appraisal and the 2025 updates to the Strategic Options Backcheck and Review (SOBR) (including Appendix B: 2024 version, section 14) **[APP-355]** in relation to 'Offshore 1'. The ExA is aware of the local authorities' assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC **[RR-2753]**. However the ExA seeks the views of local authorities in relation to the constraints (environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in table 15.2 of the SOBR). An update to this is provided in section 6 of the August 2025 **SOBR [APP-355]**. Other IPs are also invited to provide comment should they wish to do so. In doing so, could the local authorities and any other IPs provide any additional comments they may have in relation to the applicant's reasoning for discounting Offshore 1 as a reasonable alternative. The applicant is asked to provide an update on the constraints noted in section 6 of the SOBR since August 2025 relating to Offshore 1 and connection at Tilbury.	**Essex County Council** **Chelmsford City Council** **Brentwood Borough Council** **Colchester City Council** **Babergh and Mid Suffolk District Council** **Suffolk County Council** **Tendring District Council** *[All parties provided identical or near-identical responses and are consolidated to aid legibility of this document, noted as [The Council]' in text]* *[The Council]* confirms that it has reviewed the Strategic Options Backcheck and Review (SOBR) 2024, Appendix B, and the August 2025 update, alongside the applicant's alternatives assessments within ES Chapter 3 and the Design Development Report. These documents identify a series of environmental, technical and socioeconomic constraints associated with Offshore Option 1, including the requirement for a long offshore HVDC cable route, associated marine ecological considerations, and challenges relating to landfall and converter station siting at Tilbury amidst wider Freeport and port related development pressures. While *[The Council]* recognises these strategic level constraints, it also notes that the appraisal of Offshore 1 remains relatively high level, particularly when compared to the scale and permanence of the impacts that the proposed onshore overhead line would generate within *[Essex / Chelmsford / Brentwood / Colchester / Babergh and Mid Suffolk / Suffolk / north Essex and the Tendring Peninsula]* in particular with the high concentration of substations, pylons and other associated infrastructure, including the associated wide ranging National Landscape, local landscape, residential amenity, heritage, highways, business, health and well-being, agriculture, noise/vibrations and all other related and associated impacts (this list is not exhaustive). *[The Council]* further notes findings from the Hiorns Report indicating significant uncertainty in the generation background and suggesting that the need for reinforcement may be deferrable by up to five years without constraining offshore wind development, which raises questions over whether strategic offshore alternatives (including Offshore 1) have been explored with sufficient depth prior to dismissal.	The Applicant disagrees with the respondents but nonetheless notes the position of the local authorities on this matter and in the context of the Hiorns Report. The Applicant refers to its earlier submissions in response to the Hiorns Report which expressly refutes the respondents' assertions: • Page 21 and Appendix A (page 7) of **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** • Section 3.2 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant maintains a position that the need for the Project by 2030 remains urgent as independently evidenced through NESO Clean Power 2030 Annex 2[4], and within the requirements of NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and the Applicant's obligations. As stated in relation to ALT1.1 above, the Applicant considers its options appraisal to be sufficient, including in relation to option Offshore 1. The Applicant does not consider it necessary to undertake sensitivity testing or seek additional evidence from NESO on this matter. The Applicant's position, as reflected in updated Statements of Common Ground with various local authorities submitted at Deadline 4, is that this is a matter that the Applicant and the local authorities are unlikely to reach agreement on.

[4] National Energy System Operator (NESO) (2024) *Clean Power 2030, Annex 2: Networks, Connections and network access analysis*.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			In light of this, and given the potential for offshore options to reduce or avoid extensive onshore environmental and community impacts, *[The Council]* considers that further justification and updated sensitivity testing should be provided before concluding that Offshore 1 is not a reasonable alternative. The Council therefore invites the ExA to seek additional evidence from the applicant and the National Energy System Operator (NESO) regarding the need case, offshore feasibility and converter station siting, consistent with the proportionate alternatives requirements of EN1 and EN5.	
			Braintree District Council The Council has reviewed the SOBR 2024, Appendix B, the 2025 update, and the Applicant's alternatives assessment in ES Chapter 3 and the DDR. While recognising the environmental, technical and delivery constraints identified for Offshore Option 1—including marine cable length, ecological sensitivities, and converter station siting challenges at Tilbury—BDC notes that these constraints have been assessed only at a strategic level. In contrast, the onshore overhead line would impose major and moderate–major adverse impacts on Braintree's rural landscapes (LCAs B1, B4 and C6), as confirmed in the Local Impact Report (REP1-148), and would introduce permanent industrialising effects on sensitive landscape and heritage receptors including Cressing Temple Barns and Faulkbourne Hall. The Council considers that such extensive and irreversible localised harm necessitates a more robust alternatives appraisal than is currently presented. BDC also notes the findings of the Hiorns Report, which identify substantial uncertainty in the generation background, including the likelihood that many contracted projects may not come forward or may connect significantly later than ESO's contracted dates, and conclude that the Norwich–Tilbury reinforcement could potentially be deferred by up to five years without constraining offshore wind development. In light of this uncertainty, and given that offshore alternatives have not been examined beyond a high-level strategic screen, the Council does not consider that the Applicant has yet demonstrated that Offshore 1 is not a reasonable alternative. BDC therefore invites the Examining Authority to seek further justification from the Applicant and NESO, including updated need-case sensitivity analysis and more detailed assessment of offshore feasibility, before discounting options that could substantially reduce the impacts borne by communities and landscapes within the district.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
ALT 1.7	Norfolk CC Suffolk CC South Norfolk Council Mid Suffolk Council Natural England The applicant	**Waveney Valley alternative** Reasonable alternatives considered in ES chapter 3 **[APP-127]** as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the applicant's reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI. • The local authorities are asked to provide comment, as these issues do not appear to have been covered in their LIRs. • Natural England is asked to comment on the applicant's ecological considerations in its reasoning for rejection of the Waveney Valley (underground) alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss. • The applicant is asked to signpost the ExA to any pre-application consultation responses on such matters which led to its rejection of the Waveney Valley alternative.	**Norfolk County Council** NCC's position is not to deny that the Waveney Valley alternative would cause environmental issues. Instead, NCC's view is that the rejection of the WVA makes it essential that other mitigation or compensation approaches are pursued, as set out in paragraphs 11.27 and 11.28 of our **LIR [REP1-173]**: • 11.27. NCC is deeply disappointed that the use of underground cables through the Waveney Valley cannot be achieved without environmentally disruptive, technically uncertain or disproportionately costly techniques. It is NCC's strong view that the absence of an undergrounded alternative for the Waveney Valley leaves a hole in the project's mitigation for landscape and visual effects which urgently needs to be filled. The assessed major and significant residual effects are of such magnitude that the applicant had, during the statutory consultation, seriously considered undergrounding outside a designated area to be an appropriate response. • 11.28. NPS EN-1 is clear at paragraph 4.2.11 that 'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied […] Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated'. The failure to find a feasible undergrounding option to avoid impacts does not absolve the applicant from the need to consider ways in which those impacts can be reduced, mitigated or compensated for.	The Applicant has addressed the need for landscape compensation in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (see Section 3.10) and the response to written questions LV 1.18 and LV 1.28 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) do not treat offsetting (or the similar word 'compensation') in the same way as prevention or reduction. The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects. The above aligns with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects. The Applicant is also of the view that compensation is not required for every environmental effect, unless it is expressly referred to in National Policy Statement (NPS) EN-1 (2024). Notwithstanding this position, the Applicant has sought and received information in relation to the specific compensatory measures requested by Norfolk County Council and is currently seeking justification for this request against the Regulation 122 tests. Once received, the Applicant will review this information.
			South Norfolk District Council SNDC accepts the Applicant's reasoning for the rejection of the Waveney Valley Alternative (undergrounding the powerline through this sensitive valley), as noted in 6.3 ES Chapter 3 - **Alternatives [APP-127]**. The technical challenges of delivering undergrounding through the Waveney Valley, in particular because of the complex and difficult geology proved incompatible with the use of horizontal directional drilling, this has meant that this option could not, according to the Applicant, be delivered. SNDC therefore have no further comment to make.	The Applicant notes and welcomes South Norfolk District Council's response and has no further comments.
			Suffolk County Council SCC accepts the Applicant's reasoning for the rejection of the Waveney Valley Alternative (undergrounding the powerline through this sensitive valley), as noted in 6.3 ES Chapter 3 - **Alternatives [APP-127]**. The technical challenges of delivering undergrounding through the Waveney Valley, in particular because of the complex and difficult geology proved incompatible with the use of	The Applicant notes and welcomes Suffolk County Council and Mid Suffolk Council's acceptance of the Applicant's reasoning for not progressing with the Waveney Valley Alternative. The Applicant has addressed the need for landscape compensation in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (see Section 3.10) and the response to written questions LV 1.18 and LV 1.28 in

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			horizontal directional drilling, this has meant that this option could not, according to the Applicant, be delivered. SCC was, however, disappointed by the subsequent position assumed by the Applicant (in its **Comments on Relevant Representations [REP1-132]**) that since there are no formal landscape designations, this landscape does not warrant additional measures for mitigation. SCC has provided detailed comments on this matter in Annex B (Waveney Valley, Rationale for additional Matters) to its **Joint LIR [REP1 178]**. To summarise the position of the Council, a brief version is included below: • The Council considers, given that all parties have recognised and sought to work constructively together to respond to the additional sensitivities of the Waveney valley but have been unable to secure mitigation through either avoidance or embedded mitigation, that other options must be considered. • The Council considers that an appropriate package of measures to enhance landscape quality, improve access and amenity, and remove visual detractors, would be appropriate and proportionate given the sensitivity of the receiving landscape and the visual receptors who use it. As such, a package of costed measures is included in an emerging planning obligation with the Applicant. This would provide funding for the Waveney and Little Ouse Recovery ("WaLOR") Project. This aims to, amongst other things, restore fen and woodland habitats across the Waveney Valley floor and to restore previous human interventions to the course of the River Waveney by reducing meanders. SCC recognises that the Applicant is in discussion with the Waveney and Little Ouse Recovery ("WaLOR") project to acquire biodiversity units (as noted in its Comments on **Local Impact Reports [REP2-030]**). **Babergh and Mid Suffolk District Council** MSDC accepts the Applicant's reasoning for the rejection of the Waveney Valley Alternative (undergrounding the powerline through this sensitive valley), as noted in 6.3 ES Chapter 3 - **Alternatives [APP-127]**. The technical challenges of delivering undergrounding through the Waveney Valley, in particular because of the complex and difficult geology proved incompatible with the use of horizontal directional drilling, this has meant that this option could not, according to the Applicant, be delivered. MSDC was, however, disappointed by the subsequent position assumed by the Applicant (in its **Comments on Relevant Representations [REP1-132]**) that since there	**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) do not treat offsetting (or the similar word 'compensation') in the same way as prevention or reduction. The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects. The above aligns with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects. The Applicant is also of the view that compensation is not required for every environmental effect, unless it is expressly referred to in National Policy Statement (NPS) EN-1 (2024). Notwithstanding this position, the Applicant has sought and received information in relation to the specific compensatory measures requested by Suffolk County Council and Mid Suffolk District Council and is currently seeking justification for this request against the Regulation 122 tests. Once received, the Applicant will review this information.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			are no formal landscape designations, this landscape does not warrant additional measures for mitigation. MSDC and SCC have provided detailed comments on this matter in Annex B (Waveney Valley, Rationale for additional Matters) to its **Joint LIR [REP1-178]**. To summarise the position of the Councils, a brief version is included below: MSDC considers, given that all parties have recognised and sought to work constructively together to respond to the additional sensitivities of the Waveney valley but have been unable to secure mitigation through either avoidance or embedded mitigation, that other options must be considered. MSDC considers that an appropriate package of measures to enhance landscape quality, improve access and amenity, and remove visual detractors, would be appropriate and proportionate given the sensitivity of the receiving landscape and the visual receptors who use it. As such, a package of costed measures is included in an emerging planning obligation with the Applicant. This would provide funding for the Waveney and Little Ouse Recovery ("WaLOR") Project. This aims to, amongst other things, restore fen and woodland habitats across the Waveney Valley floor and to restore previous human interventions to the course of the River Waveney by reducing meanders. MSDC recognises that the Applicant is in discussion with the Waveney and Little Ouse Recovery (WaLOR) project to acquire biodiversity units (as noted in its **Comments on Local Impact Reports [REP2-030]**).	
			Natural England Natural England notes the applicant's rationale and commends the weight given by the applicant to environmental impacts. Peatland is considered to be irreplaceable habitat and therefore impacts should be avoided where possible. We have not been consulted on the scale of loss or potential mitigation given that it is not proposed by the applicant. Note that Natural England does not consider local landscape and amenity to be part of its core remit and does not possess local knowledge relating to impacts on these features and are therefore unable to comment on that aspect or the balance of competing interests.	The Applicant notes Natural England's response and has no further comments.
ALT 1.8	The applicant	**Other site specific alternatives** A number of IPs in their RRs have suggested moving small sections of the pylons and OHLs to reduce effects on their individual property, land or business, as well as	**Chelmsford City Council** CCC asks that consideration is given to the following receptors as listed within its LIR:	The Applicant's response to question ALT 1.8, as provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, includes an appended table (Appendix D). This table lists the suggested design changes that were identified in Relevant

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		certain landscape features. The applicant is asked to provide a table which sets out all such specific requests, and indicate whether such relocation is possible within the limits of deviation of the order limits. If not possible within the order limits, the applicant is asked to provide within the table a response to each IP which explains why such a relocation is not possible.	• TB124 – 120 m from Annex, Valentines, Boreham Road, Gt Leighs • TB124 - 158 m from Glebelands, Boreham Road, Gt Leighs • TB124 – 164 m from 3 Cole Hill Cottages, Boreham Road, Great Leighs (semi detached pair with Porchleigh Cottage) • TB138 – 156 m from Chatham Hall Bungalow, Chatham Hall Lane, Little Waltham • TB138 – 183 m from Albion House, Braintree Road, Little Waltham • TB141 – 72 m from Windmill House, Chelmsford Road, Great Waltham • TB141 – 117 m from The Red House, Chelmsford Road, Great Waltham • TB141 – 144 m from Little Bakers Cottage, Chelmsford Road, Great Waltham • TB141 – 183 m from 1 Lace Cottages Chelmsford Road Great Waltham (semi detached pair with 2 Lace Cottages) • TB141 – 197.6 m from Sweet Briar, Chelmsford Road, Great Waltham • TB141 – 177.4 m from Corner Cottage Chelmsford Road, Great Waltham (semi detached pair with Meadowview) • TB141 – 180 m from Larks Lodge, Larks Lane, Great Waltham • TB142 – 194 m from Balls Farm, Larks Lane, Great Waltham • TB142 – 187 m from Rievers, Larks Lane, Great Waltham • TB143 – 152 m from Balls Farm, Larks Lane Great Waltham • TB144 – 154 m from Rose Cottage, Larks Lane, Great Waltham • TB155 – 200 m from Springwood, Mashbury Road, Chignal St James • TB156 – 185 m from Springwood, Mashbury Road, Chignal St James • TB156 – 200 m from Brittons Hall Farm Mashbury Road, Chignal St James • TB162 – 185 m from The Haven, Roxwell Road, Writtle	Representations, as well as previous rounds of consultation, where there is scope to potentially respond within the Order Limits and proposed Limits of Deviation to reduce effects for the benefit of a particular Interested Party. In addition **8.11 Approach to Scenarios [Revision B]** sets out the Applicant's consideration with reference to the height and number of pylons TB140, TB141 and TB142. The Applicant has considered requests from residents directly, so best to understand where they want change and the details of that desired change.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• TB162 – 182 m from Bylake Kennels, Roxwell Road, Writtle • TB169 – 147 m from Range Cottage, Ongar Road West, Writtle • TB171 – 140 from Annex at Halfway House, Highwood Road, Writtle • TB171 – 200 m from Caravan at Littlefield, Highwood Road, Writtle • TB174 – 190 m from Green Acre, Bumpsteads Farm, Margaretting Road, Writtle • TB174 – 197 m from Victors Croft, Nathans Lane, Writtle • TB175 – 191 m from The Willows, Nathans Lane, Writtle • TB179 – 200 m from Copfold Hall Farm, Writtle Road, Margaretting • TB180 – 180 m from Inner Lodge, Writtle Road, Margaretting • TB181 – 193 m from Hoopers, Ivy Barns Lane, Margaretting (semi detached pair with Ivy Barns) • TB182 – 169 from Marshalls Farm, Handley Green Lane, Margaretting • TB182 – 170 m from Handley Green Barn, Handley Green Lane, Margaretting • TB182 - 187m from Handley Green House, Handley Green Margaretting • TB192 – 131m from Buttsbury Hall farm, Ingatestone Road, Stock • TB193 - 120 m from White Tyrells Cottages, Ingatestone Road, Stock	
ALT 1.9	All local authorities	**Limits of Deviation (LoD)** A number of the local authorities' LIRs refer to the limits of deviation and the potential for the OHLs and pylons to move closer to sensitive receptors and listed buildings. Paragraph 3.2.28 of ES chapter 3 **[APP-127]** refers to the limits of deviation, noting that they retain flexibility to allow for necessary adjustment during detailed design and construction phases. It is stated that minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst-case scenario within the established parameters.	**Essex County Council** ECC appreciates the need for flexibility as set out in paragraph 3.2.28 of the ES chapter 3 (APP-127). However, drawing on the commentary raised within the ECC Local Impact Report (paragraphs 5.3.5-5.3.14), it is considered that the ES fails to justify the level of deviation being sought, especially why it is at a greater level than other precedents. The paragraph furthermore does not address contextual sensitivities, where some locations the LoD may have a greater impact than in other areas. Overall, ECC rejects the Applicant's assertion (as set out in ES Chapter 3 paragraph 3.2.28) that the LoD proposal provides sufficient certainty and that a "worst case	Limits of Deviation (LoD) are representative of the maximum deviation to allow for the adjustment to final positioning (and height) of pylons to avoid localised constraints or unknown or unforeseeable issues that may arise, such as poor ground conditions or archaeological finds, as detailed in Table 4.3 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. As stated in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**, the longitudinal movement is restricted by technical requirements on a span-by-span basis with regards to maintaining electrical clearances and the subsequent potential swing of the conductor (both of which vary from one span to another,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		The local authorities are invited to comment on this paragraph.	scenario" has been robustly assessed. Many affected local authorities have identified the same problem: ECC is of the view that the LoD regime as currently set out in the draft DCO is excessively wide, and materially and collectively increases the risk of environmental, heritage, landscape, residential amenity, arboricultural, and cumulative impacts beyond those assessed in the ES. In summary, ECC submits that paragraph 3.2.28 of ES Chapter 3 cannot be relied upon to justify the degree of design flexibility sought, because: ECC believes the proposed LoD introduces significant uncertainty and allows materially worse impacts than assessed. ECC highlights that [in many instances] LoD powers allow pylons and overhead lines to move: • Laterally by up to 50 m within the limits shown on the works plans • Longitudinally anywhere within the Order Limits shown on the works plans • Vertically by up to +6 m (and up to +18 m for some pylons) • Permanent structures (substations / CSECs) to move anywhere within their Works Plan envelopes, with up to 10% height uplift. ECC is of the view that these tolerances fundamentally undermine the assertion that the ES has assessed the "reasonable worst case". In practice, the final constructed form and location of structures could be materially different—potentially closer to sensitive receptors, of greater height or massing, or differently aligned within the LoD. Such variations, and the resulting individual and cumulative effects, have not been assessed within the ES. Moreover, these changes could arise repeatedly across multiple locations within the project, thereby compounding unassessed impacts and rendering the purported worst-case assessment unreliable. Heritage: LoD can convert low level harm into mid level harm. ECC's position is that the ES impact ratings are based on fixed pylon positions, not the full LoD envelope. ECC has also identified that LoD can bring pylons up to 50m closer to listed buildings and conservation areas, potentially raising harm from "low" to "mid level" Less Than Substantial Harm (LTSH). There are also instances in the ES where heritage assets have been assessed as "mid level LTSH" – utilising the excessive flexibility allowed for in the LoD may then result in greater harm if pylons shift closer or become taller.	subject ground topography, land use and cover and span length). 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 re-assessment is required should the LoD be used during detailed design. /In response to heritage specific concerns, the assessment presented within Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** has been undertaken on the design shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** and **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]**. 'Sensitivity testing' has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in **7.2 Outline Code of Construction Practice [Revision D]** to restrict the longitudinal LoD. The assessment in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			ECC is of the view that the LoD undermines the robustness of the heritage assessment and creates unacceptable risk of greater harm to designated assets. Landscape & Visual: LoD could potentially materially worsen visual, residential, and community impacts. ECC argues that the applicant's assertion that LoD does not worsen effects to be incorrect, for example: The proposed LoD regime creates risk of pylon relocation immediately adjacent to multiple residential properties along the entire project corridor. Such relocations could introduce even more harmful encroaching towards private garden areas and will undoubtedly increase already harmful overbearing and domineering effects. In addition, the proposed LoD regime is likely to increase risk of landscape harm in [open plateaus and valley landscapes]. For example, a vertical deviation of +6m (or +18m) will undoubtedly intensify intrusion. For these and many other reasons as already set out in ECC's submissions to date to this Examination, ECC disputes the Applicant's claim that movement within LoD cannot worsen significant landscape effects. For these reasons ECC position is that the proposed LoD regime directly conflicts with NPS EN 1 / EN 5 requirements to minimise harm through siting and design, because it introduces excessive post consent freedom to worsen harm, and this worsening of harm has not been adequately assessed in the ES. Ecology, arboriculture and hedgerows: LoD could potentially increase unassessed loss. An overly flexible LoD regime such as the one proposed may cause additional tree and veteran tree loss. In Essex, the proposed LoD regime could threaten ancient woodland trees, SSSI/LOWs/etc Some of the baseline information relied upon by the Applicant in respect of protected trees and important hedgerows appear to be inaccurate. At the very least the Applicant should be required to produce mapping of all important hedgerows and protected trees within LoD because the maximum allowed movement could capture assets not previously assessed. The proposed LoD regime therefore enlarges the environmental footprint beyond what the ES has assessed. Noise, vibration, highways, and construction impacts: ECC's view is that current noise assessments do not model full LoD worst case positions. Construction impacts, haul routes, access tracks and temporary compounds could shift inside the LoD corridor, worsening effects on residents and other sensitive receptors. ECC	vertical increase in height of up to 6 m from the pylon design heights presented within **2.3 Works Plans Sections A and B [APP-017 and APP-018], Section C [Revision B], Sections D to G [APP-020 to APP-023] and Section H [Revision B]**. The Applicant has provided an overview of its approach to LoD in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** (item 4.2). Further clarification has also been provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (in response to DCO 1.A15).

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			therefore considers that there is inadequate justification for such broad LoD flexibility in respect of these matters. ECC position is that: The applicant has not justified why such extensive LoD is needed; LoD powers are far wider than in comparable NSIPs (e.g., Bramford–Twinstead); and NPS EN 1 requires proportionate flexibility, and EN 5 requires siting and design mitigation—neither of which is achieved here. ECC considers that more clearly defined LoD controls are required and in broad terms, ECC is asking for: i. A reduction in the overall scale of permissible deviation, ensuring any vertical, lateral, or longitudinal flexibility remains genuinely proportionate and does not enable materially greater impacts than those assessed. ii. Robust micro siting and deviation controls in sensitive areas, including a requirement for meaningful Local Planning Authority oversight and approval for any deviations in environmentally or socially sensitive areas (with such areas to be appropriately identified through the Examination process). iii. Clear definition and transparent mapping of the outer limits within which any deviation could occur, so stakeholders and affected communities fully understand the potential envelope of impacts. iv. Stronger binding safeguards to ensure that LoD cannot lead to increased harm to heritage assets, landscape character, ecological receptors, residential amenity, or other sensitive environmental or community interests. v. Appropriate constraints to prevent deviations that would move infrastructure closer to high sensitivity receptors or otherwise intensify effects beyond what has been assessed in the Environmental Statement.	
			Chelmsford City Council CCC acknowledges the Applicant's need for engineering flexibility. Yet the limits of deviation allow a pylon to be sited anywhere within the red line. The Applicant states that only minor changes would take place, but there is no definition of 'minor' and changes and movement closer to a sensitive receptor or listed building would not be perceived by the occupant (or CCC itself in the case of a Listed Building) to be of a 'minor' change, irrespective of whether it has been considered within the Environmental Statement on a worse case basis.	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			It is not clear how many pylons within the route would need to be moved within the red line boundary, but cumulatively, if a high number of pylons were moved, this may not be considered to be a non-material change. A Requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors. It would be prudent, prior to submission that affected receptors within 200 metres of the pylon are notified in writing of such change and a site notice is displayed. Occupants should be asked to comment on the movement of such pylon and given 21 days to respond. The following wording is proposed: 1. Where a pylon is proposed to be resited within the Limits of Deviation, no phase of the construction works to such pylon may commence until details of— b) the layout; b) scale (including height); c) proposed finished ground levels; d) external appearance; e) consultation report containing details of occupants notified and a list of site notices and locations display and (i) programme for landscaping works, relating to that pylon have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.	
			Brentwood Borough Council BBC rejects the applicant's assertion (as set out in ES Chapter 3, Paragraph 3.2.28) that the LoD proposal provides sufficient certainty and that a "worst-case scenario" has been robustly assessed. BBC is of the view that the LoD regime as currently set out in the draft DCO is excessively wide – laterally by up to 50m, longitudinally anywhere within the Order Limits, vertically by up to +6m (and up to +18m for some	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			pylons), and permanent structures (substations / CSECs) to move anywhere within their Works Plan envelopes, with up to 10% height uplift – and materially and collectively increases the risk of environmental, heritage, landscape, residential amenity, arboricultural, and cumulative impacts beyond those assessed in the ES. BBC is of the view that these tolerances fundamentally undermine the assertion that the ES has assessed the "reasonable worst case". In practice, the final constructed form and location of structures could be materially different—potentially closer to sensitive receptors and/or groups of sensitive receptors, of greater height or massing, or differently aligned within the LoD. Such variations, and the resulting individual and cumulative effects, have not been assessed within the ES. Moreover, these changes could arise repeatedly across multiple locations within the project, thereby compounding unassessed impacts and rendering the purported worst-case assessment as at best unreliable.	
			Norfolk County Council NCC has reviewed paragraph 3.2.28 of ES Chapter 3 **[APP-127]**, which states that: "As an NSIP, the DCO provides flexibility through Limits of Deviation (LoD)… minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst case scenario within the established parameters." NCC's concern, raised at paragraphs 6.11 to 6.18 of our **LIR [REP1-173]**, in relation to the limits of deviation is that there is considerable variation to the amount of harm done to, for example, veteran trees and ancient woodlands within the lateral limits. For example, a number of alternatives are in fact discussed by the applicant in relation to the crossing of the Tas Valley in section 4.4 of the design development report **[APP-122]**. The decision-making between alternatives within the LoD is obscure. Despite the acknowledgement in the design development report that the options trade off harms against particular veteran trees, there is no explicit evaluation of these harms in a readily comparable way.	Please refer to response to Essex County Council above.
			Colchester City Council CCC understand the need for limits of deviation on a scheme of this scale and complexity but highlight that in certain situations bringing the alignment away from the centre line potentially brings it even closer to receptors. CCC are particularly concerned about residential receptors. For example (but not limited to), Hines Close	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			in Aldham where the alignment passes close to a residential cul de-sac. The proposed LoD in theory could result in the pylon alignment sitting directly next to these residential receptors to the detriment of the residents. CCC acknowledges the Applicant's need for engineering flexibility. Yet the limits of deviation allow a pylon to be sited anywhere within the red line. The Applicant states that only minor changes would take place, but there is no definition of 'minor' and changes and movement closer to a sensitive receptor or listed building would not be perceived by the occupant to be of a 'minor' change, irrespective of whether it has been considered within the Environmental Statement on a worse case basis. It is not clear how many pylons within the route would need to be moved within the red line boundary, but cumulatively, if a high number of pylons were moved, this may not be considered to be a non-material change. A requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors. It would be prudent, prior to submission that affected receptors within 200 metres of the pylon are notified in writing of such change and a site notice is displayed. Residents should be asked to comment on the movement of such pylon and given 21 days to respond. The following wording is proposed: 1. Where a pylon is proposed to be resited within the Limits of Deviation, no phase of the construction works to such pylon may commence until details of - a) the layout; b) scale (including height); c) proposed finished ground levels; d) external appearance; e) consultation report containing details of occupants notified and a list of site notices and f) programme for landscaping works, relating to that pylon have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			4. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.	
			Thurrock Council The Council believe the Applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their Environmental Statement assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. The Council requests a more detailed explanation of the Applicant's assessment methodology.	Please refer to response to Essex County Council above.
			Braintree District Council Braintree District Council (BDC) has reviewed paragraph 3.2.28 of ES Chapter 3 **[APP-127]**, which states that: "As an NSIP, the DCO provides flexibility through Limits of Deviation (LoD)… minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst-case scenario within the established parameters." BDC does not agree that the Environmental Statement (ES) demonstrates that a genuine worst-case scenario has in fact been assessed within those parameters. As set out in the Council's Local Impact Report (REP1-148), the ES assessments for landscape and visual amenity, heritage, noise and residential visual amenity are all based on fixed, indicative pylon locations, rather than modelling the full extent of the lateral, longitudinal and vertical movement permitted by the LoD. In several cases, the Applicant's own documents confirm that alignment positions represent a "preferred draft alignment" or a "graduated swathe" rather than the outer limits of potential deviation. The dDCO allows for up to 50 m lateral deviation (owing to the relative size of the order limits) and up to 6 m vertical deviation in pylon siting. The LIR (Paragraphs 7.10.3 & 7.10.4) identifies that such changes could materially alter the extent, magnitude and significance of impacts on sensitive receptors. For example, in landscape terms, BDC has already identified major and moderate major adverse effects within LCAs B1, B4 and C6. These findings were reached on the basis of the	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			illustrative alignment; any movement toward settlements, heritage assets or key viewpoints could increase dominance, extend theoretical visibility and intensify wirescape effects. The ES does not demonstrate that these potential outcomes, representing the true worst-case within the LoD, have been assessed. Similarly, for the historic environment, the ES identifies less-than-substantial harm to multiple listed buildings based on the indicative pylon locations. Under the LoD, pylons could be brought significantly closer and may be taller than assessed. The LIR (Paragraphs 10.5.4 – 10.5.8) notes that such changes could worsen the setting impacts on highly sensitive assets such as Cressing Temple Barns and Faulkbourne Hall, with no evidence that this scenario has been modelled or tested in the ES. In relation to construction noise, the LIR highlights (Section 14.4) that assessments were based on the indicative pylon positions, despite the fact that construction areas for each pylon can extend substantially beyond the assessed location. This could place heavy plant and construction activity closer to sensitive receptors than assumed in the ES, increasing the risk of significant adverse effects. Again, no evidence is provided that worst-case LoD positions were used for modelling. For these reasons, BDC does not consider that paragraph 3.2.28 accurately reflects the level of environmental uncertainty introduced by the LoD. While the Applicant asserts that the ES has accounted for the worst-case within the LoD, this is not demonstrated in topic chapters and does not align with the evidence presented in the LIR. The Council therefore invites the Examining Authority to seek clarification on: - how the Applicant has defined "worst-case" within the LoD in each assessment topic; - whether the minimum receptor distances permitted by the LoD have been modelled; and - what safeguards will be secured in the dDCO to prevent unassessed harm arising from the exercise of the LoD. Until such clarification is provided, the Council remains concerned that the LoD create a material risk that the final constructed scheme could give rise to greater landscape, visual, heritage and noise impacts than those reported in the ES. The Council supports other Council's in their suggestion of a requirement which would capture where LOD's are to be used at the detailed construction stage.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Babergh and Mid Suffolk District Council BMSDC does not agree that the Environmental Statement (ES) demonstrates that a genuine worst-case scenario has in fact been assessed within those parameters. In several cases, the Applicant's own documents confirm that alignment positions represent a "preferred draft alignment" or a "graduated swathe" rather than the outer limits of potential deviation. The dDCO allows for up to 50 m lateral deviation and up to 6 m vertical deviation in pylon siting. The LIR identifies that such changes could materially alter the extent, magnitude and significance of impacts on sensitive receptors. The ES does not demonstrate that these potential outcomes, representing the true worst-case within the LoD, have been assessed. Similarly, for the historic environment, the ES identifies less-than-substantial harm to multiple listed buildings based on the indicative pylon locations. The applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their ES assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. BMSDC request a more detailed explanation of the applicant's assessment methodology. In relation to construction noise, the LIR highlights that assessments were based on the indicative pylon positions, despite the fact that construction areas for each pylon can extend substantially beyond the assessed location. This could place heavy plant and construction activity closer to sensitive receptors than assumed in the ES, increasing the risk of significant adverse effects. Again, no evidence is provided that worst-case LoD positions were used for modelling. For these reasons, BMSDC does not consider that paragraph 3.2.28 accurately reflects the level of environmental uncertainty introduced by the LoD. While the Applicant asserts that the ES has accounted for the worst-case within the LoD, this is not demonstrated in topic chapters and does not align with the evidence presented in the LIR. The Councils therefore invite the ExA to seek clarification on: a) how the Applicant has defined "worst-case" within the LoD in each assessment topic;	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			b) whether the minimum receptor distances permitted by the LoD have been modelled; and c) what safeguards will be secured in the dDCO to prevent unassessed harm arising from the exercise of the LoD. Until such clarification is provided, BMSDC remains concerned that the LoD create a material risk that the final constructed scheme could give rise to greater landscape, visual, heritage and noise impacts than those reported in the ES. BMSDC support other Councils in their suggestion of a requirement which would capture where LOD's are to be used at the detailed construction stage.	
			Suffolk County Council SCC acknowledges the Applicant's need for engineering flexibility. Yet the limits of deviation allow a pylon to be sited anywhere within the red line. SCC is not currently able to accept the Applicant's contention that in all of its assessments it has assumed a worst-case scenario within the Limits of Deviation ("LoD"), so that no further control is needed in sensitive locations on the siting of the works within the LoD. To illustrate SCC's concerns, it refers to the example of Roydon Hall, which is a Grade II* listed building in the close vicinity of Pylons RG157, 158, and 159 to the north east of Creeting St Peter in Mid Suffolk (as shown on Sheet 11 of Section B of the **Works Plans [APP 018]**). The Applicant has stated in Table 11.6 of the replacement Chapter 11 of the **ES [AS-068]** that: *"The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for this LoD. The assessment in this chapter and its appendices has considered the potential effects of locating pylons or conductors anywhere within the LoD, typically up to 50 m either side of the proposed overhead line."* The Applicant has stated in Table A11.2.2 of replacement Appendix 11.2 of the **ES [AS-070]** *"The construction phase of the Project would alter the wider rural setting of the asset through the introduction of pylons RG156-158, a pulling location associated with pylon RG157, three SuDS basin locations, overhead line mitigation works, and the temporary haul road.* *These works would introduce plant noise and movement into the rural setting of the asset. These works are, at their closest, 100 m to the south-east of the asset and would be occasionally visible through and above the tree*	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			cover within the asset's grounds. The magnitude of impact is considered to be medium adverse." The stated minimum distance of 100m would seem to relate to the siting of only the low level works rather than any of the pylons or overhead lines. SCC finds it difficult to understand how an assessment of a medium adverse impact was reached if it was also assumed that the pylons could be sited "anywhere" within the LoD and so, potentially, as close as about 220m from Roydon Hall. SCC also notes that the vertical LoD for the pylons would allow them to be up to 6m higher than a standard lattice pylon (typically 15m). SCC would welcome clarification from the Applicant as to how the exercise of assuming the pylons in this location could be "anywhere" within the LoD and how that assumption informed the assessed impact of medium adverse on the GII* heritage asset at Roydon Hall. SCC would stress that it has used Roydon Hall and the topic of heritage simply as an example to explain its concerns on the Applicant's approach to the assessment of effects within the LoD, but the concern applies more generally, including the assessment of landscape and visual impacts, as set out in the **Joint Suffolk LIR [REP1-178]**. The Applicant states that only minor changes would take place, but there is no definition of 'minor' and changes and movement closer to a sensitive receptor or listed building would not be perceived by the occupant to be of a 'minor' change, irrespective of whether it has been considered within the Environmental Statement on a worse case basis. It is not clear how many pylons within the route would need to be moved within the red line boundary, but cumulatively, if a high number of pylons were moved, this may not be considered to be a non-material change. A requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors. This issue is addressed further in the Joint Suffolk LIR (in particular in Chapters 8 and 13 of **[REP1-178]**).	
			Tendring District Council TDC rejects the applicant's assertion (as set out in ES Chapter 3 paragraph 3.2.28) that the LoD proposal provides sufficient certainty and that a "worstcase scenario" has been robustly assessed. Affected local authorities identify the same problem: TDC is of the view that the LoD regime as currently set out in the draft DCO is excessively wide, and materially	Please refer to response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			and collectively increases the risk of environmental, heritage, landscape, residential amenity, arboricultural, and cumulative impacts beyond those assessed in the ES. TDC, in consultation with ECC, has already provided detailed reasoning and supporting evidence within its Relevant Representation and Local Impact Report to explain the basis for this position. In summary, however, TDC submits that paragraph 3.2.28 of ES Chapter 3 is, in practice, incorrect and cannot be relied upon to justify the degree of design flexibility sought, because: The proposed LoD introduces significant uncertainty and allows materially worse impacts than assessed. TDC highlights that LoD powers allow pylons and overhead lines to move: • Laterally by up to 50 m • Longitudinally anywhere within the Order Limits • Vertically by up to +6 m (and up to +18 m for some pylons) • Permanent structures (substations / CSECs) to move anywhere within their Works Plan envelopes, with up to 10% height uplift. TDC is of the view that these tolerances fundamentally undermine the assertion that the ES has assessed the "reasonable worst case". In practice, the final constructed form and location of structures could be materially different – potentially closer to sensitive receptors, of greater height or massing, or differently aligned within the LoD. Such variations, and the resulting individual and cumulative effects, have not been assessed within the ES. Moreover, these changes could arise repeatedly across multiple locations within the project, thereby compounding unassessed impacts and rendering the purported worst case assessment unreliable. Heritage reasons: LoD can convert low level harm into midlevel harm- TDC position is that the ES impact ratings are based on fixed pylon positions, not the full LoD envelope. • TDC has identified that LoD can bring pylons up to 50m closer to listed buildings and conservation areas, potentially raising harm from "low" to "midlevel" Less Than Substantial Harm (LTSH). • Also, there are instances in the ES where heritage assets have been assessed as "midlevel LTSH" – utilising the excessive flexibility allowed for in the LoD may then result in greater harm if pylons shift closer or become taller.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			TDC is of the view that the LoD undermines the robustness of the heritage assessment and creates unacceptable risk of greater harm to designated assets. Landscape & Visual: LoD could potentially materially worsen visual, residential, and community impacts TDC argues that the applicant's assertion that LoD does not worsen effects to be incorrect, for example: • The proposed LoD regime creates risk of pylon relocation much closer to already severely affected residential properties, not only in the district of Tendring but also along the entire project corridor. Such relocations could introduce even more harmful encroaching towards private garden areas and will undoubtedly increase already harmful overbearing and domineering effects. • The proposed LoD regime is likely to increase risk of landscape harm in valued local Tendring landscapes such as open plateaus and valley landscapes. For example, a vertical deviation of +6m (or +18m) will undoubtedly intensify intrusion. • For these and the numerous other reasons set out in TDC's LIR, TDC rejects the applicant's assertion that movement within the LoD cannot give rise to worsened significant landscape effects. This is particularly the case in locations that are clearly visible from the National Landscape, where even modest shifts in alignment or height have the potential to further intensify adverse impacts on both the setting of the National Landscape and the National Landscape itself. For these reasons TDC's position is that the proposed LoD regime directly conflicts with NPS EN1 / EN5 requirements to minimise harm through siting and design, because it introduces excessive post consent freedom to worsen harm, and this worsening of harm has not been adequately assessed in the ES. Ecology, arboriculture and hedgerows: LoD could potentially increase unassessed loss • An overly flexible LoD regime such as the one proposed may cause additional tree and veteran tree loss. • As set out in relevant submissions in the district of Tendring the proposed LoD regime could threaten protected lanes such as Wick Lane and local wildlife sites especially those around Ardleigh Reservoir. • Some of the baseline information relied upon by the applicant in respect of protected trees and important hedgerows appear to be inaccurate. At the very least	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			the applicant should be required to produce mapping of all important hedgerows and protected trees within LoD because the maximum allowed movement could capture assets not previously assessed. The proposed LoD regime therefore enlarges the environmental footprint beyond what the ES has assessed. Noise, vibration, highways, and construction impacts not assessed across full LoD • TDC's view is that current noise assessments do not model full LoD worst case positions • Construction impacts, haul routes, access tracks and temporary compounds could shift inside the LoD corridor, worsening effects on residents and other sensitive receptors. TDC considers that there is inadequate justification for such broad LoD flexibility TDCs position is that: • The applicant has not justified why such extensive LoD is needed. • LoD powers are far wider than in comparable NSIPs (e.g., Bramford–Twinstead). • NPS EN1 requires proportionate flexibility, and EN5 requires siting and design mitigation – neither of which is achieved here. TDC considers that significantly tighter and more clearly defined LoD controls are required. In broad terms, TDC is asking for: • A reduction in the overall scale of permissible deviation, ensuring any vertical, lateral, or longitudinal flexibility remains genuinely proportionate and does not enable materially greater impacts than those assessed. • Robust micro siting- and deviation controls in sensitive areas, including a requirement for meaningful Local Planning Authority oversight and approval for any deviations in environmentally or socially sensitive areas (with such areas to be appropriately identified through the Examination process). • Clear definition and transparent mapping of the outer limits within which any deviation could occur, so stakeholders and affected communities fully understand the potential envelope of impacts.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Stronger binding safeguards to ensure that LoD cannot lead to increased harm to heritage assets, landscape character, ecological receptors, residential amenity, or other sensitive environmental or community interests. • Appropriate constraints to prevent deviations that would move infrastructure closer to high sensitivity-receptors or otherwise intensify effects beyond what has been assessed in the Environmental Statement.	

5. Air quality and emissions

Table 5.1 Air quality and emissions

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
AQ 1.4	All local authorities	**Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets?** ES Chapter 7 at paragraph 7.2.19 lists the names of the key regional and local plan documents relevant to each individual county and local authority area. Each local authority is asked whether their development plan documents contain any standards or expectations related to air quality that exceed government targets? If so the ExA would ask for the relevant authority to confirm what those standards are and what formal consultation/ adoption processes those air quality standards/ expectations have been subject to.	**Essex County Council** ECC confirms that the Essex Air Quality strategy does not set any limits or maximum thresholds for air pollutants - It aims to reduce pollutants by as much as is practicable. **Chelmsford City Council** The Chelmsford Local Plan 2013 – 2036 does not contain any standards or expectations related to air quality that exceed government targets. **Brentwood Borough Council** BBC can confirm that its Local Plan policies relevant to Air Quality (Strategic Policy NE08: Air Quality) do not contain standards or expectations that exceed government targets. **Norfolk County Council** NCC's Minerals and Waste Local Plan does not contain its standards or expectations related to air quality, though it briefly references the national Planning Practice Guidance in relation to guidance on when an air quality assessment should be carried out and what information should be included. This is specifically in relation to applications for minerals and waste planning applications and the policy is of limited relevance to this case. **South Norfolk District Council** Not applicable to SNDC as there is no specific policy in the local development management plans regarding air quality. **Thurrock Council** The Council responds to the question regarding standards/expectations above and beyond standard government targets, confirming that there are no such standards for air quality management in Thurrock. Statutory targets for air pollutants are adhered to in Thurrock's local policy and practice. **Braintree District Council** The Council do not have any Development Plan documents which exceed Government targets.	The Applicant welcomes confirmation from the Local Authorities on this matter.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Babergh and Mid Suffolk District Council BMSDC confirm that there are no air quality standards or expectations in the development plan, the BMSDC Joint Local Plan.	
			Tendring District Council TDC's currently Local Plan does not contain any standards or expectations related to air quality that exceed government targets.	
			Suffolk County Council Documents referred to in **ES Chapter 7 [APP 147]** at paragraph 7.2.19, relating to Suffolk, are the Babergh and Mid Suffolk Joint Local Plan – Part 1 (Babergh and Mid Suffolk District Councils, 2023) and the Ipswich Local Plan 2018-2036, adopted 2022 (Ipswich Borough Council, 2022). To confirm, neither document sets out specific standards which exceed Government targets. Both plans have an objective 'To maintain and where possible improve air quality'. From a Suffolk County Council Public Health perspective there is no safe level of air pollution. Evidence shows that both long-term exposure (over years) and short term exposure (over hours) to low levels of air pollution can impact health with poor air quality linked to a range of conditions from asthma and lung cancer to heart disease and dementia. SCC (Public Health) would therefore welcome consideration being given to the World Health Organisation's updated guidance which recommends pollution levels up to four times lower than the statutory legal limits currently set in the UK, to protect public health. Whilst the Council acknowledges that these guidelines are not statutory in the UK, they do highlight a shift in understanding around the levels at which air pollution can harm health and the growing body of available evidence to support this. SCC would also like to draw the Applicant's attention to The Clean Air Strategy 2019 which sets out Government plans for dealing with sources of air pollution: "An aim is to shift the focus towards prevention, promoting greater action to avoid exceedances, rather than tackling air pollution only when limits are surpassed." With this in mind, SCC (Public Health) would like to see an emphasis, from the Applicant, on bringing air pollution levels down as low as possible for the health and wellbeing of our residents.	The Applicant notes the Local Planning Authority's response. The Applicant has raised the methodology to be used in assessment with Local Planning Authorities through scoping (**6.19 Scoping Report [APP-288 – APP-296]**) and agreed within **6.20 Scoping Opinion [APP-297]**. The Local Planning Authorities did not raise local standards or expectations or World Health Organization guidelines in their consultation responses or through any engagement via Statements of Common Ground, Local Impact Reports or Relevant Representations since the Development Consent Order submission. The assessment is aligned with the UK government requirements and air quality standards as per policy. The assessment results in **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** show that for human health, concentrations are predicted to be well below relevant air quality objectives.

6. Biodiversity ecology and natural environment

Table 6.1 Biodiversity ecology and natural environment

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
BIO 1.7	The applicant	**Badger setts and construction** Table A8.15.2 of the updated **Badger Report - Confidential [AS-042]** indicates that a total of 231 badger setts are present in the survey area (order limits plus a 30m buffer), and this figure includes 48 main setts. As noted in Table A8.15.1 of **[AS-042]** if a main sett requires closure, mitigation must be provided usually involving the construction of an artificial sett along with proof of uptake by badgers. Notwithstanding paragraph 6.1.44 of the outline Landscape and Ecological Management Plan (outline LEMP) **[AS-046]**, set out in more detail the process you would undertake, what is the timeline for this would be and explain how the ExA can be confident that, in any locations where main setts may require closure, sufficient time has been allowed for so that any necessary works would be fully completed and replacement setts occupied before construction commences.	**Holton St Mary Parish Council** We would be happy to discuss badger setts confidentially with the Inspectorate as we would rather not divulge more details in writing in the public domain. The issue is pressing for Holton St Mary. We welcome the Inspectorate's request for further information on how the ExA can be confident that, in any locations where main setts may require closure, sufficient time has been allowed for; so that any necessary works would be fully completed and replacement setts occupied before construction commences. HSM Parish Council looks forward to the applicant's submission of the details as so many hedgerows and oak trees will be taken out by the haul road as it approaches and transects the west of the village, plus the new proposed temporary access road north of the village. More information can be supplied.	With respect to badger setts the Project has avoided impacts to main breeding setts as far as possible. A draft badger licence has been produced that identifies the main breeding setts that would be affected by the Project; this has been approved by Natural England and a Letter of No Impediment has been received and is submitted into the examination at this deadline. There is sufficient time for the Applicant to undertake pre-construction surveys and the appropriate mitigation measures including partial or full sett closures to ensure no harm or disturbance to badgers should it be required. The Parish Council's concern with respect to the loss of hedgerows and trees is noted by the Applicant. The Applicant is committed to minimising impacts on trees and hedgerows as far as practicable and providing replacement planting wherever impacts are unavoidable. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that, following detailed design and prior to construction, surveys will 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 D]**. Further commitments in relation to retaining trees and hedgerows include B08 and LV04.In addition the Applicant has committed to delivering 10% Biodiversity Net Gain across the Project.
BIO 1.10	The applicant Babergh District Council Mid Suffolk District Council	**Post-consent monitoring and assessment of effects** Babergh DC in [RR-0314] and Mid Suffolk DC in [RR-2540] have questioned the assumption that post consent licences would ensure neutral or beneficial outcomes for protected species and consider that there would be limited post-mitigation monitoring to enable this to be assessed. • To the applicant: Notwithstanding your response in **[REP1-132]**, please respond to the concerns raised by Babergh DC and Mid Suffolk DC and explain how you have reached your assessment on this.	**Babergh and Mid Suffolk District Council** The BMSDC concern has been slightly misinterpreted. The concern is not for the level of post-licence monitoring, it is for the planned scope of protected species mitigation (most specifically the bat roost compensation). BMSDC holds that it is a flawed and insufficiently supported assumption that the Natural England derogation licensing process should be anticipated to always maintain the favourable conservation status of an affected species. This is partly because of a widespread lack of robust (i.e. long-term and replicated) post mitigation monitoring. The low level of follow-up scrutiny	The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. Aerial inspections/emergence surveys would be undertaken following detailed design when it is clear which trees with potential bat roosting features would be impacted by the Project. The proposed level of survey, post-detailed design, follows the Bat Conservation Trust (BCT) Guidelines (2023)[5] survey effort for trees, where PRF-M trees require a minimum of three aerial inspections/emergence surveys to determine the presence/likely absence of roosting bats and PRF-I trees require no further survey other than a pre-works PRF check to determine

[5] Collins (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		• To Babergh DC and Mid Suffolk DC: Explain why you consider that additional post-consent monitoring is needed beyond anything that might be specified in the protected species licensing process.	does not allow for a confident prediction of how successful various mitigation plans are in actual application (depending on the impacted bat species, roost type, location, etc.). That is not meant to portray the NE licensing process as ineffective per se, but it is a recognition of one of its practical limitations. In the case of the Norwich to Tilbury project, there should also be more recognition of the uncertainty of the predicted bat roost impact potential. Research has demonstrated that bat roost feature detection via ground-level inspection, aerial inspection, and via three roost emergence surveys (those conducted during a limit season) will have a high rate of false negative determination (e.g. Andrews & Gardener, June 2015, CIEEM's In Practice issue 88; BATS Research & Training presentation, August 2023, https://www.batlicence.co.uk/can-we-do-better/). The Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) advise that because of the limitations inherent to the process of identifying bat roosts in trees, "… it is arguable that all trees with bat-roosting potential should be considered part of a roosting resource that will be used at one time or another by tree-roosting bats." Adding to this fundamental constraint to predicting the bat roosting impacts from large-scale tree loss is the fact that this project is following a non-standard survey protocol. This approach has meant that the Environmental Statement's impact assessments for bat species other than barbastelle are based on minimal survey information. The Norwich to Tilbury Outline LEMP states that only PRF-M trees (as identified by ground-level assessment) are to be subject to a series of aerial inspections/ emergence surveys prior to works. Of the PRF-M trees to be felled, only those trees confirmed to support roosting bats by aerial inspections or emergence surveys will be compensated for under a Natural England mitigation licence. By following that approach, BMSDC believes that the overall impact on bat roost resources along the project route will be significantly under-estimated and under-mitigated. To be more suitably assured of the adequacy of the roost tree mitigation, BMSDC believes that the bat roost mitigation measures should be expanded. The losses of all PRF-I and PRF-M trees should be recognised as a loss of bat roosting resource, regardless of the results of a very limited number of presence/absence surveys. The anticipated roosting resources loss should be countered via an agreed proportionate compensation comprising a mix of bat boxes and tree veteranisation (see Hinds & Davidson-Watts, Dec 2012, CIEEM's In Practice issue 118).	occupancy immediately before works. BCT are the industry's leading advisors for bat conservation and therefore the Applicant is satisfied that the approach and survey effort, post-detailed design, adheres to BCT Guidelines (2023) and therefore follows industry standards. Any tree (PRF-M or PRF-I) that is found to have roosting bats, during post-detailed design survey or pre-works checks, will be compensated for under a Natural England mitigation licence (not just PRF-M). Licensing is a pragmatic approach to avoid significant negative effects on roosting bats and maintain favourable conservation status. The Project is committed to deliver 10% net gain (despite not yet being a requirement for Nationally Significant Infrastructure Projects). Therefore there would be, as a minimum, no net loss of woodland habitat and individual trees would be replaced at a ratio of 3:1 (detailed within **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**), as such it is considered that there would likely be no net loss in available roost resource, over time, and could potentially increase the overall roost resource availability after a number of years (as there would be significantly more trees planted than if only those with PRFs were replaced). While it is acknowledged that there would be a time delay in those newly planted trees to develop PRFs (through damage or decay), it is also acknowledged that the wider landscape across the Project route is largely rural with woodland and tree habitat available to potential roosting bats and therefore bats are not considered to be without a suitable roost resource in the interim. As discussed with the local planning authorities bat boxes would be installed and veteranisation of trees would take place to mitigate for potential short-term loss of features that have the potential to support bats that are not confirmed bat roosts. The Applicant will continue to work with the council with respect to agreement on the replacement ratio of trees to boxes/ veteranisation. Updated details on the above will be included within the next iteration of the Outline Landscape and Ecological Management Plan at Deadline 5.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
BIO 1.13	The applicant	**The use of bird diverters** The ExA notes that bird diverters are proposed in two locations **[APP-327]**. Explain why these are not proposed in other locations where concentrations of birds may occur. What monitoring mechanism is in place in order to assess whether any other locations may need bird diverters installed in the future and how is the potential for such adaptive management secured in the draft DCO? Furthermore, what mechanism is in place for the monitoring of those locations where bird diverters are proposed? What adaptive management measures are proposed, such as additional mitigation or compensation, should monitoring indicate that bird diverters alone are insufficient to prevent significant impacts on local bird populations, and how is this currently secured in the draft DCO?	**Ardleigh Parish Council and Little Bromley Parish Council** The Parish Councils note that mitigation measures ("orange spacers and bird diverters") are proposed at Ardleigh Reservoir, between pylons TB15 and TB16 **[APP-327]**. 11 However, the ALBA has three other significant bodies of water that would also be in close proximity to the proposed overhead lines: (i) new reservoir/proposed country park at Crown Quarry, (ii) Reservoir/Fishing Lake behind Colchester Road (which is a Local Green Space that would be spanned by the cables) and (iii) Fishing lake/reservoir at Peake Fruit. These areas and the surrounding fields attract a lot of birdlife, which would also pose a risk, including swans and geese. No mitigation measures appear to have been proposed for these areas. Further, the Parish Councils are unfamiliar with "orange spaces and bird diverters" and is unclear as to how effective such measures are, particularly in circumstances of poor lighting or fog. It is also unclear as to what additional impacts may arise from these measures, such as increase noise, visual impact and, presumably, increased maintenance requirements. Additionally, the Parish Councils remain concerned about the impacts on the local bat population, and are unclear as to what measures are proposed to support them, as well as the limited Ardleigh Reservoir mitigations. These are all points that the Applicant should respond to as part of this examination.	The Applicant can confirm that orange spacers and bird diverters are to be included in the design of the Project between TB15 and TB16 on a precautionary basis to reduce the risk of collision for birds using Ardleigh Reservoir. With respect to the Council's query as to why orange spacers and bird diverters have not been incorporated into the design for the Project elsewhere in the Council's area of interest, the Applicant makes the following points with respect to the three locations identified by the Councils. • Crown Quarry – bird diverters are proposed where the overhead line over sails Ardleigh Reservoir. Crown Quarry is located to the west of Ardleigh Reservoir and to the south of the proposed route for the overhead line outside the Order Limits. The quarry does contain waterbodies and the vantage point surveys conducted at Ardleigh covered potential bird movements to / from these waterbodies. As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** the surveys did not identify any flight concentrations / behaviour of notable collision concern. As the Project does not over sail the country park other than at the reservoir there is no particular part of the overhead line where orange spacers and bird diverters could be placed on a precautionary basis. The existing proposal for bird diverters and orange spacers over Ardleigh Reservoir is considered sufficient • Reservoir/Fishing Lake behind Colchester Road – it is not clear which waterbody is of concern. The Applicant assumes that it is the waterbody to the north-east of Ardleigh Reservoir at Ordnance Survey grid reference TM 0482 2981, which has been considered in the collision risk assessment. It is a small waterbody (approximately 1.1 ha in area), surrounded by tall trees, and as such, sub-optimal for supporting large numbers of waterbirds. Nevertheless, the vantage point survey included this waterbody as it is 0.7 km from the Ardleigh vantage point and within the 2 km viewing arch used in vantage point surveys. The surveys did not reveal any notable movements of birds to / from this waterbody and collision risk is assessed as negligible in this area • Fishing lake/reservoir at Peake Fruit – The surface area of this waterbody is under 2 ha and the waterbody is surrounded by woodland; these factors limit the suitability of this waterbody to support large numbers of waterbirds. Large numbers of swans,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				geese and waders are generally found in more open wetland habitats. Wintering bird surveys using transects were carried out in this area and notable numbers of waterbirds were not recorded at this location. In addition, the overhead line does not cross this waterbody, but passes to the south, therefore flight paths between the waterbody and the River Stour which is linked to the estuary that is designated for wintering birds remain unaffected. Collision risk in this area was assessed within **5.3 Habitats Regulations Assessment Report [APP-082]**; the risk was assessed as not significant with no detrimental effect on the Stour and Orwell Estuaries Special Protection Area and Ramsar site. This conclusion was agreed with Natural England. In view of this assessment bird diverters and orange spacers are not considered necessary at this location The fields surrounding these three areas that are of concern to the Councils were surveyed for wintering birds using transects supplemented by vantage point observations (these survey areas are identified as Survey Locations 10 and 11 in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**). Significant concentrations of birds were located to the north-west where two areas of Functionally Linked Land for lapwing and golden plover were identified as shown in **5.3 Habitats Regulations Assessment Report [APP-082]**. In this location the Project is to be placed underground and so there is no requirement for bird diverters or orange spacers in this location. Mitigation measures are proposed in these areas for both wintering and breeding birds. Mitigation measures are secured through the **7.2 Outline Code of Construction Practice [Revision D]**. These include but are not limited to, the implementation of pre-work bird surveys by an Ecological Clerk of Works, Construction Exclusion Zones around retained habitats / breeding areas, and control measures for noise and vibration to reduce disturbance. In accordance with National Policy Statement EN-5 (2024), the Applicant has considered measures to reduce collision risk, including the use of bird diverters and spacers to increase line visibility where appropriate. Diverters are proposed to be installed at the River Waveney and Ardleigh Reservoir as a precaution. The Applicant notes comments regarding the effectiveness of bird diverters in low light conditions, fog or at night. While no single mitigation measure can eliminate all collision risk, peer-reviewed evidence and industry experience demonstrate that diverters can materially reduce collision

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				rates in many circumstances, particularly during daylight and crepuscular periods. The Project therefore applies diverters as part of a wider mitigation package, alongside careful routeing, span design and pylon placement, following the mitigation hierarchy. In response to the comment concerning additional visual impact, Visual Receptor Areas C11 (Langham) and C12 (Ardleigh) within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]** report significant adverse visual effects resulting from the Project. Bird diverters are small structures and would appear very small when viewed in the context of the Project. Taking into account the potential for the use of bird diverters at the reservoir, the Applicant notes that the overall assessment would remain unchanged, with judgements reported as significant and adverse.The Applicant directs the Councils to the r comments it has provided to their response to BIO 1.10 above with respect to the bat survey methods and mitigation. A comprehensive suite of bat surveys was undertaken as reported in **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]**, **6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036]** and **6.8.A11 Environmental Statement Appendix 8.11 - Bat Radio-tracking Report [APP-173]**. Mitigation takes the form of avoidance of impacts to potential roost features by avoiding removal of mature trees where possible through route selection and micro-siting at detailed design. Where it would be necessary to remove a tree with features suitable for use by bats, then surveys would be undertaken. If the presence of a bat roost is confirmed, mitigation would be provided under licence in the form of replacement roosts sites and timing works to avoid harm to bats.
BIO 1.18	The applicant Natural England	**European protected species and licensing:** Should the Order be made, the ExA notes that the applicant proposes further survey work for European protected species once the detailed design has been formulated. However, the ExA is also aware of the results of the existing surveys for species that confirm a presence in places within the relevantstudy areas for species including bats, water vole and otter. • To Natural England: The ExA notes the applicant's intention to obtain letters of no impediment (LONIs) from you. Provide an update on the current status of negotiations regarding all LONIs that are being sought and comment on whether you consider there to be any likely issues associated with, or impediments to, LONIs being issued for all relevant species.	**Natural England** Natural England provided letters of no impediment dated 30 March 2026 to the applicant in relation to badgers and dormice and a further advice letter in relation to bats. We will provide further updates regarding protected species at our earliest opportunity.	Copies of the Letters of No Impediment for water vole, dormouse and badger, along with a letter of comfort on bats from Natural England, have been provided to the Examining Authority at Deadline 4 in **8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		• To applicant: Explain how the ExA can be assured that appropriate measures are in place at this stage in order to ensure that there would be nosignificant adverse effects on any European protected species.		
BIO 1.21	The applicant	**Assessment of tree removal at Local Wildlife Sites (LWS)** Table 8.23 of ES Chapter 8 **[AS-026]** for some LWSs such as Great /Little Edney Woods, and Langley Deer Park states that: "some tree removal would be required to facilitate electrical clearances, but this would be minimal." Please explain why it is not possible to provide a worst-case scenario for these sites that would calculate the number of trees or area of woodland and other habitat that would be lost, since detailed figures have been provided for habitat loss for sites such as Buckingham Hill LWS. Since "some tree removal" is an unspecific term, explain how the ExA can be confident in the robustness of the impact assessment conclusions that have been drawn in Table 8.23 of ES Chapter 8 [AS-026]?	**Chelmsford City Council** CCC welcomes this clarification and reiterates its preference to understand the worse case scenario. Given that Langley Deer Park is a registered park and garden CCC would expect that full details are provided in accordance with this national designation.	It is noted that Langley Deer Park is a registered Park and Garden; however, as a heritage designation this has been a consideration under the heritage assessment. Within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** impacts on Langley Deer Park have been assessed as a Local Wildlife Site (LWS). As stated in the Applicant's response to BIO 1.21 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, based on the current design <0.001 ha of trees within Langley's Deer Park LWS would be coppiced/pruned to facilitate overhead line electrical clearance. At detailed design it may be possible to avoid coppicing /pruning trees within the LWS, but as identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** this small amount of pruning would not have a significant effect on the LWS in terms of ecology and biodiversity.
BIO 1.25	Natural England	**Ancient woodland inventory** In **[RR-2658]** you state that you will provide further advice on potential interactions of the proposed development with parcels of ancient woodland that have recently been added to the inventory. Natural England is asked to provide an update on this.	**Natural England** Following advice from our Ancient Woodland specialists, Natural England advises that additional parcels of Ancient Woodland not currently evaluated within the environmental statement should be subject to assessment through a supplementary document. Natural England will engage further with the applicant.	The Applicant, at Deadline 3, submitted **8.10.1 Ancient Woodland Technical Note [REP3-058 – REP3-062]**; this technical note presents the updates to the Ancient Woodland Inventory relevant to the Project. The inventory updates include revisions to existing ancient woodland extents and the inclusion of additional ancient woodland areas reflecting ongoing improvements in the identification and classification of ancient woodland across England. **8.10.1 Ancient Woodland Technical Note [REP3-058 – REP3-062]** concludes that there are no material changes to the assessments and conclusions reported in the Environmental Statement in relation to ancient woodland.
BIO 1.37	The applicant	**Opportunities for joint working/ interactions with other projects** The ExA notes that in O35 of the **Applicant's Comments on Relevant Representations [REP1-132]** in response to comments made by Essex CC you have referenced the landscape proposals for the proposed development being influenced by those for the neighbouring Five Estuaries and North Falls substation sites. Explain how your assessment of cumulative effects on biodiversity has been undertaken in this area where multiple NSIP projects could be undertaken at the same time. Set out in more detail the opportunities for joint working/ a co-ordinated approach to habitat creation, biodiversity enhancement and management that you	**Ardleigh Parish Council and Little Bromley Parish Council** The Parish Councils are concerned that there is no evidence of anything that comes close to: a) A joint biodiversity strategy b) Any integrated environmental mitigations c) Any co-ordinated ecological planning when it comes to the multiple NSIPS and other development in the ALBA.	As identified previously in the written response to this question (**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**) the Applicant has worked with other Nationally Significant Infrastructure Projects (NSIPs) to minimise the effects of the Project. A joint biodiversity strategy is not a requirement of the Development Consent Order process. Several NSIP schemes interact with the proposed new East Anglia Connection Node (EACN) substation at Ardleigh. The landscape mitigation comprises new planting in the Environmental Areas; this planting has been designed to create habitats of value to biodiversity linked to existing habitats and features in the wider landscape. The Environmental Areas would be owned and managed by

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		have pursued so far with the proponents of other significant developments, and how this will develop in the future should all schemes achieve consent. Also, in **[REP1-250]** (and elsewhere) Lower Thames Crossing Project has raised concerns about the location of the Tilbury North substation impacting on the nitrogen deposition and ancient woodland mitigation areas that are proposed in the made LTC DCO and which are noted by the applicant in Table 6.1 of **[REP1-134]**. The ExA understands that the applicant is in discussions with the Lower Thames Crossing Project on this matter. However, the applicant is requested to explain how any potential effects arising from the proposed development on these mitigation areas for LTC have been assessed in its consideration of inter-project cumulative impacts in **ES Chapter 17 [APP-281]**.		the Applicant. Collaboration with other NSIPs would take place to ensure connections to the proposed new EACN substation would not negatively affect the planting. The Applicant would be responsible for the creation and long-term management of these Environmental Areas. Mitigation for the biodiversity impacts elsewhere within the Order Limits takes the form of avoidance of habitats and features of value to biodiversity and planting to replace habitats that need to be temporarily removed to facilitate the Project. A Net Gain in Biodiversity is to be achieved by purchasing units off-site. This replacement planting would not be affected by the other NSIPs and so it is not clear what purpose a joint strategy would serve; there is no biodiversity strategy that would require cross-project collaboration.
BIO 1.38	The applicant	**Local Nature Recovery Strategies** Notwithstanding your comments in, for example, O34 of **[REP1-132]** that Local Nature Recovery Strategy areas would be considered as part of the off-site BNG selection process, explain how your proposed mitigation, compensation, enhancement and BNG measures have thus far had regard to the Local Nature Recovery Strategies that have now been produced by Essex CC, Norfolk CC and Suffolk CC.	**Mrs Penny Lang** The Applicant does not appear to have taken into account the Essex Local Nature Recovery Strategy of Colchester City Council's Local Plan Green/Blue Infrastructure strategy. This sees the Roman River Nature Corridor passing through Aldham and Marks Tey Parishes, which are crossed by the pylons and will cause habitat loss. The Colne River Valley and Roman River Valley area, together with a large farm reservoir nearby act as a magnet for wildlife in general and birds in particular. The many bird species, including flocks of geese on regular twice-daily passage, together with little egrets, cormorants and herons are all seen near these local water sources. The larger water birds, as well as many others including passerines, are also all subject to the dangers of wire collision from the pylons. Those which take off and land on the reservoir are exceptionally susceptible to this risk. I understand from Natural England that their role in this matter is narrow, but they agree that there is a risk of collisions with overhead lines. They make it clear that it will be for the Planning Inspectorate to consider the evidence around risks to birds. And bird diverters are not a good deterrent in many conditions (Please also see Pylons East Anglia submission B 1.12)	The Applicant's Response to the Examining Authority's Written Question BIO 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** identifies how the Applicant has considered the Local Nature Recovery Strategies in designing the habitats that would be created by the Project in the Environmental Areas. Please refer to the Applicant's response to BIO 1.12 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** for a response on bird mortality and collision risk. Collision risk has been assessed within **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**. This includes a comprehensive desk study reviewing designated sites, aerial habitat assessments and collation of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list including geese, egrets, cormorants and herons. These records were mapped out to identify hotspots, assess risk and the areas offering the highest potential to support birds taken forward for further assessment. NatureScot (2016) guidance[6] was used to determine Target Species and Secondary Species with regard to collision risk, which includes geese, egrets, cormorants and herons are discussed in BIO 1.12 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Wintering / passage bird surveys have been undertaken along rivers and surrounding floodplain, including the

[6] NatureScot (2016) Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				Colne River Valley, to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. Vantage point surveys along the Colne Valley recorded greylag geese, Canada geese, cormorants and herons. The bird numbers, flight height and/or flight behaviour of these species during the surveys resulted in a conclusion that collision risk is not significant. Please see the Applicant's response to **Pylons East Anglia submission BIO 1.12** for further detail on these points as well as a response to the effectiveness of bird diverters and the role of Natural England during the consultation process. With regard to the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site and the Stour and Orwell Estuaries SPA and Ramsar site, Natural England have agreed with the conclusion of No Significant Effect presented in **5.3 Habitats Regulations Assessment Report [APP-082]**.
BIO 1.39	The applicant	**Ecology Working Group** In paragraph 9.10 of their joint **LIR [REP1-178]** Suffolk CC, Mid Suffolk SDC and Babergh DC have raised the need for an Ecology Working Group to be instigated to allow for consultation and monitoring to be undertaken for any post-consent mitigation, compensation and BNG. Is it your intention to set up such a working group and if not, justify why not? If such a group is to be formed, then suitable wording should be inserted into the next version of the outline versions of the outline LEMP and outline CoCP.	**Essex County Council** ECC would encourage that all relevant local authorities are part of any ecology working group. **Chelmsford City Council** CCC welcomes the formation of an Ecology Working group.	The Applicant welcomes the Councils' future participation in the Ecology Working Group.
BIO 1.44	The applicant Suffolk Wildlife Trust	**Restoration measures at CWSs** In **[RR-3522]** Suffolk Wildlife Trust considers that restoration at Sproughton Park CWS, Fore and Busheys Grove CWS and Thrandeston Marsh CWS is of concern and that the aim should be to improve the habitat condition rather than just restore. • To Suffolk Wildlife Trust: What discussions have you had with the applicant over the restoration of these sites and what additional measures would you wish to see? • To applicant: Comment on the concerns raised by Suffolk Wildlife Trust and explain whether the enhancement of these sites is being considered as a potential BNG option?	**Suffolk Wildlife Trust** Suffolk Wildlife Trust have not discussed restoration of CWSs in any more detail than that outlined within our Statement of Common Ground. The additional measures which would like to see are included below, and fully detailed within our Written Representations. Thrandeston Meadow CWS The reinstatement of grassland is considered within the Outline LEMP. Suffolk Wildlife Trust agree that reinstatement should be undertaken at the earliest appropriate time of year following works. The reinstatement of original turf is not considered, which we see as acceptable for this location where works avoid the most floristically important areas. The identification of a suitable seed mix, comprising of locally sourced seed (either from the CWS or nearby donor site), should be informed by surveys already undertaken at Thrandeston Marsh CWS. Further consideration should extend to the	These County Wildlife Sites (CWSs) and Local Wildlife Site (LWS) would be affected by works associated with undergrounding UK Power Networks' electrical cables. Works that are undertaken by UK Power Networks under the DCO would be carried out in accordance with the environmental protection measures set out in **7.2 Outline Code of Construction Practice [Revision D]** and **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. Bespoke measures to protect these sites are included in these documents and **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes commitments to monitoring. The Applicant notes the Wildlife Trust's requests for the reinstatement of grassland habitat and will update **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** to include a preference for appropriate locally-sourced grass seed mix or green hay for both Thrandeston Marsh CWS and Sproughton Park CWS.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			use of locally sourced green hay; Suffolk Wildlife Trust are happy to share information regarding the Suffolk Green Hay Register with the applicant. We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering the desired outcomes. The use of green hay should again be considered at this stage as part of remedial measures to increase floral diversity. Sproughton Park CWS Suffolk Wildlife Trust agree with the applicant that reinstatement should be undertaken at the earliest appropriate time of year following works. The identification of a suitable seed mix should be informed by vegetation surveys already undertaken at Sproughton Park CWS; as per our comment above, we believe that a seed mix should be locally sourced. The use of green hay has not been considered but would provide an additional option to promote local provenance. We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering desired outcomes. The use of green hay should again be considered at this stage as part of remedial measures to increase floral diversity while retaining local provenance. In addition to these recommendations regarding habitat restoration measures, we also seek assurances that measures will be in place to ensure reptiles have access to hibernacula during the process of undergrounding an existing overhead line. The easiest method to insure this is to create new hibernacula either side of the undergrounded overhead line to ensure that no individual is isolated from hibernacula. Following completion of works, hibernacula should be left in place to provide enhancement for the onsite reptile population. Suffolk Wildlife Trust strongly suggest that post-development monitoring of the population is undertaken to ensure the CWS continues to qualify as a Key Reptile Site following works.	Sproughton Park CWS is a Key Reptile Site and as such the measures outlined in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** with respect to reptile mitigation would be implemented this includes the measures outlined by the Wildlife Trust. The Wildlife Trust's support in using a combination of natural regeneration and planting to restore the area of Fore and Bushey Grove LWS is noted. As noted in **7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-033]** no tree loss is anticipated and it is expected that the areas would be restored via natural regeneration.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Fore and Bushy Grove CWS Guidance within the Outline LEMP for the reinstatement planting of woodland habitats suggests that low height, shallow rooted shrub species will be planted; these do potentially fit within the woodland edge habitat already present. The species proposed for shrub planting, provided within Appendix C of the Outline LEMP, are typically frequent within Suffolk woodland shrub layers, and the final selection should focus on those species already present within the CWS; if suitable, wild-service tree should be included in addition to those outlined. If species which already occur within the planting list proposed are present within the area of the CWS then Suffolk Wildlife Trust would support an element of natural regeneration being allowed to occur in this area. If this were to be undertaken then we understand that as per the previous habitat, management restrictions would be in place. Given the need for ongoing management to ensure vegetation growth remains suitable over the undergrounded 33kV line Suffolk Wildlife Trust assume that monitoring will be undertaken here. Suffolk Wildlife Trust further would welcome the inclusion of any additional support which could be provided to the landowner towards management of the CWS. Summary Suffolk Wildlife Trust hope that the above information suitably answers that part of Question BIO1.44 directed to us. We look forward to discussion with the applicant regarding the above matters, which we hope will be included within an updated Statement of Common Ground in due course.	
BIO 1.48	The applicant	**Failure rate for replacement planting** Babergh DC in **[RR-0314]** and Mid Suffolk DC in [RR-2540] have stated that a failure rate should be factored in to compensation planting. The ExA notes that, as stated on page AB7 of **[REP1-132]**, you have proposed a 3 to 1 ratio for replacement planting "for individual trees and individual trees within small groups". However, in [RR-0391] Brentwood BC states "replacement planting on a 3:1 basis is reinstatement, not compensation." Please comment on this and also explain what would constitute "small groups" of trees.	**Chelmsford City Council** CCC agrees that a failure rate should be applied.	The Applicant maintains its position as set out within BIO 1.48 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
BIO 1.49	Suffolk CC Babergh DC Mid Suffolk DC	**BNG and mitigation for breeding birds** In your joint **LIR [REP1-178]** Suffolk CC, Babergh DC and Mid Suffolk DC have commented that mitigation for impacts on breeding bird populations should be provided in addition to BNG habitat creation or enhancement. Further to the applicant's response on page AB8 of the **Applicant's Comments on Relevant Representations [REP1-132]**, set out what, if any, additional mitigation you would wish to see in this regard?	**Babergh and Mid Suffolk District Council** Refer to **[REP1-132]**	As the Council refers to the Applicant's document (**8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**), the Applicant is not clear whether Babergh and Mid Suffolk District Council are satisfied that their concerns with respect to bird mitigation have been adequately addressed.
			Suffolk County Council Further to our previous comments, SCC have received additional clarification on the wording within the ES chapter, in the Comments on the LIR provided by the Applicant **[REP2-030]**, which has shown that the BNG environmental areas would o additional enhancement to breeding and wintering bird populations rather than providing required compensation for habitat loss. It is therefore not considered necessary that additional mitigation be provided beyond that proposed within the current OLEMP.	The Applicant welcomes Suffolk County Council's acknowledgement that the measures in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** are sufficient mitigation for wintering and breeding birds.

7. Habitats Regulations Assessment

Table 7.1 Habitats Regulations Assessment

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
HRA 1.1	South Norfolk DC	**Norfolk Valley Fens Special Area of Conservation (SAC) and Floddon Common SSSI** In [RR-3417] you have made reference to direct impacts on Norfolk Valley Fens SAC (and Floddon Common SSSI). Explain what you consider the direct impacts would be and how they would arise.	**South Norfolk District Council** Paragraphs 9.5, 9.6, and 9.7 of [RR-3417] raises concerns about indirect impacts due to the proximity of the proposed works to the watercourse – risk include pollution, changes in ground water or deposition of dust (see 6.17 REP2 -015 Outline code of Construction Practice notes there is potential to discharge surface water to watercourses and abstract water which could impact the SSSI. Mitigation measures are listed in Table 6.1 of the oCOCP but these are secured via Requirement 4. There is no mechanism to secure mitigation for pre commencement works. We refer to our earlier comments on lack of control of pre-commencement works of Appendix D, Paragraph 3.2.1 of SNDC's LIR.	As identified in **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, Natural England are in agreement in the content of the Habitats Regulations Assessment. Natural England has accepted that with mitigation measures in place to protect water quality there would be no significant effect on Norfolk Valley Fens Special Area of Conservation. As set out in Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**, no stage of the development can take place until plans are submitted and approved by the Local Planning Authorities; this includes the Code of Construction Practice (CoCP) which identifies the environmental protection measures. Each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1) of Requirement 4 (this includes the CoCP), unless otherwise agreed with the relevant planning authority, securing the delivery of the agreed mitigation measures.

8. Draft Development Consent Order

8.1 Articles

Table 8.1 Draft Development Consent Order - Articles

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
DCO 1.A2	The applicant Local Authorities Relevant statutory undertaker Other relevant determining body The applicant Local Authorities Relevant statutory undertaker Other relevant determining body	**Articles (general) - 2** Throughout the articles contained in the **draft DCO [APP-056]** the applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified. Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant determining bodies have to/ or are required go through. For example, your understanding of: any application validation period; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles; and any decision issuing periods that may apply. All local authorities, relevant statutory undertaker and or other relevant determining body: provide a summary of any processes you are required to go through, including any time period in the number of days required to undertake that process. For example, any application validation process; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles relevant; and any decision issuing periods that may apply.	**Essex County Council** ECC supports the ExA's concern regarding the unacceptable length of many of the time periods contained in the draft DCO especially where the expiration of a time period is linked to deemed consent. Timeframes set out in the DCO must be sufficient for ECC and district authorities to register (5 working days), consult with stakeholders (15 working days), consider responses and seek amendment, if necessary (10 working days), write reports and arrange for decisions to be issued (5 working days). Based on direct experience with the discharge of requirements for Longfield Solar Farm NSIP and Bramford to Twisted NSIP, while extensions of time are often agreed through good working relationships, the discharge of the requirements is best facilitated on a strong, collaborative working partnership with the Applicant. ECC consider that 56 days (8 weeks) would be a reasonable period to facilitate the efficient processing of Requirements. ECC would also highlight that in many instances decisions on the discharge of requirements will be made before the 56 days period being requested.	The Applicant refers to its response to ExQ1 DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and notes that this position has been further developed in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]**. The Applicant updated timings in **3.1 Draft Development Consent Order [Revision D]** that was submitted at Deadline 3 from 28 days to 25 business days.
			Chelmsford City Council CCC is a Discharging Authority on the Longfield Solar Farm DCO EN010118, which has a discharging timeframe of 10 weeks. CCC is aware that Suffolk County Council have produced a response to this question and defers to their response. Their response indicates that a timeframe of 56 days is necessary. In CCC's experience as a Discharging Authority for Longfield Solar Farm DCO, the areas that take time to process a Requirement include the following: • Requirement validation • Requirement consultation (21 days) • Report writing and consideration of consultation comments.	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Reconsultation. CCC reiterates that the need for reasonable timeframes is not about delaying the Project. It about making sure that CCC has sufficient time to undertake all of the necessary processes and statutory functions. CCC has a good working relationship on Longfield Solar Farm and is happy to provide further examples and best practice on this where required. From experience, complicated technical discharges relating to numerous plans and documents, requiring considerable consultee input, Officer assessment and administration support take time. There is no mechanism for reconsultation within the current NSIP requirement discharge process and CCC is dependent upon the Applicant as to whether they will allow it or not. Should an Applicant refuse re-consultation, the remaining options are to refuse or withdraw the Requirement resulting in untimely delay and further administration. Where additional information is needed, the Applicant needs time to prepare the submission, then CCC needs to receive it, reconsult and await the consultation comments. This takes time and can impact upon the consideration of the requirement. CCC would prefer to be given appropriate and reasonable time to deal with the requirements, without asking for additional extensions of time requiring further administration. Should this DCO be granted, it is critical that CCC has the appropriate means and time to do so.	
			Brentwood Borough Council BBC agrees with the ExA that the 28-day period will be too short for both the quantity and quality of work expected from a proper and considered response. BBC is also of the view that the scope of potential processes that the ExA has underlined in its question bears out that the 28-day period will be insufficient, as officers will be expected to execute tasks such as these as part of a much wider caseload of work and with increasingly limited resource capacity. BBC supports the concerns of the ExA and affected authorities along the route in seeking a suitably extended time period for response.	Please refer to the Applicant's response to Essex County Council above.
			Norfolk County Council NCC request a period of 56 days. This aligns with the 8 week statutory time limits for applications made under a planning condition under The Town and Country Planning (Development Management Procedure)	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			(England) Order 2015, though it is important to note that there is no equivalent enactment which applies to discharges of requirements for DCOs made under the Planning Act 2008 as each individual DCO makes its own provision. Fifty-six days would allow time for: • up to 5 days from receipt to issue consultations and up to 10 days from receipt to consider whether to request further information; • up to 21 days for consultees to respond to the discharging authority, as per standard development management timescales; • up to 19 days to consider consultee responses, conduct site visits, resolve issues with the applicant and, where relevant, coordinate with other discharging authorities; • up to 7 days to produce a decision report; • up to 7 days to seek senior officer sign-off according to delegations. NCC would note that because the discharge of DCO requirements is not standardised in the same way as the discharge of planning conditions under the town and country planning regime, different authorities will have different requirements according to their own governance and delegation arrangements.	
			South Norfolk District Council Receipt and Validation of Discharge of Requirement Application (SNDC have a service standard of 3 working days target for validation of its applications). Formal Consultation with statutory, technical consultees and other bodies as set out in the Requirement are sent once the application has been made valid. This is for 30 days in line with EIA development however, the Council frequently gets requests from external statutory, technical consultees for additional time to provide a formal response. Case Officer to assess, review consultee responses, and prepare and issue formal decision notice (as SNDC have delegated powers which enable us to do this without the need for Committee approval). This would be a minimum of 5 working days following the expiry of the consultation period should there be no objections from the consultees. In order to accommodate this, SNDC refer you to our Relevant Representation with our request for a minimum of 56 days.	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Colchester City Council CCC require 56 days. This is because it can take 2-3 days to upload the documents and put them on to the in-house system at validation stage. It is reasonable to take two working weeks (so ten days working days or 14 calendar days) to fully assess the scheme BUT if other consultees are needed to be consulted then they would need a standard 21 days in which to assess and comment. This is critical as the consultees may require changes. Less than 56 days will result in refusals of the requirements and this has happened on other DCOs. 56 days allows the applicant time to make changes and then allows the LPA the time to reconsult. It then takes a week to write any report needed for senior officer checking. It is then reasonable to give a senior planner time to read that report. It then takes a day or two to issue the decision to the applicant.	Please refer to the Applicant's response to Essex County Council above.
			Thurrock Council The Council does not agree with the Applicant's proposed consultation period of 28 days. Following discussions with other Essex Local Planning Authorities, the Council considers that a period of 56 days would represent a more appropriate and reasonable timeframe for consultation. Within Thurrock, the determination of major planning applications can take up to 10 weeks and where matters are referred to Planning Committee, this can extend up to 20 weeks. While the statutory minimum consultation period is 21 days this period is often extended for larger or more complex applications. Such extensions are often necessary to ensure consultees have sufficient time to provide a comprehensive response. Given the scale of the proposed development, the Council considers a longer consultation period essential for robust assessment and effective decision making.	Please refer to the Applicant's response to Essex County Council above.
			Braintree District Council Braintree District Council (BDC) welcomes the opportunity to clarify the internal processes and statutory or practical time periods relevant to discharging requirements under the draft DCO. At present, NSIP "Discharge of Requirement" submissions are received via email, as the Council's planning portal is not configured to accommodate NSIP submissions. Initial administrative processing, logging, and distribution to internal consultees typically takes 1–3 working days.	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			In terms of technical assessment, most Requirement submissions contain complex, discipline specific material. The Council therefore usually allows internal and external consultees 21 days to provide comments. This period can be extended by workload pressures, staff leave, involvement of multiple specialists, or the need to consult with external statutory bodies. It only takes one specialist being unavailable for decisions to be delayed. The Council's experience is that, where issues arise with the adequacy or clarity of submitted information, a 28-day or 35-day determination period does not provide sufficient time to identify issues, request revisions, await further information, and then re-consult if necessary. Under these compressed timescales, the only options available would be repeatedly seeking extensions of time or refusing the submission to avoid triggering deemed consent, neither of which is an efficient or proportionate outcome. Once all consultee comments have been received and any issues resolved, the Council's Conditions Officer prepares a report. This is then reviewed by the lead officer and passed to the team manager for final review and sign-off. Depending on officer availability, leave and other casework commitments, this stage alone can require at least one week. The Council notes that even under the 35-day period used in the Bramford to Twinstead DCO, supported by a Planning Performance Agreement that enabled pre-submission review, discharging requirements has been highly challenging, and has repeatedly placed pressure on both Applicants and the planning authority. As stated in the Council's Local Impact Report (REP1-148), BDC considers that a period of 56 days represents the minimum realistic and workable determination period. This timeframe: • accounts for submission validation and internal logging; • allows consultees adequate time to review often highly technical material; • provides capacity to resolve deficiencies in submissions; • enables re-consultation where needed; and - allows for internal reporting, checking, and sign-off A 56-day period therefore provides a proportionate and reasonable balance: it protects Applicants from unnecessary delay while ensuring that the planning authority can undertake the process lawfully, robustly and without undue risk of deemed consent arising from procedural bottlenecks.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Babergh and Mid Suffolk District Council BMSDC are requesting a minimum of 35 days for determination of submissions for approval made pursuant to requirements. Whilst this is consistent with the Bramford to Twinstead DCO, our experience of supporting delivery of this project is that the 35 day deadline is often insufficient to enable appropriate determination in time. The BMSDC process and timeframe for submissions is as follows: Receipt, inputting and validation: Checking the application is complete and accurate on its face, creating an application record in our internal system. 1-2 days Initial check and instruction: Case officer checks the submission in detail to ensure all documents are received and all consultations are sent. Occurs within 5 days of valid application. 1 day. Consultations to technical advisers, statutory bodies and other affected authorities: 21 days Process management: It is often necessary to respond to consultee queries, provide more information, consider requests for an extension to the 21 day deadline or to chase for outstanding responses. Typically, 1-2 days per submission. Review consultation advice: The case officer will review the advice received. This may necessitate communication with the applicant via email, phone / Teams call or a formal meeting between parties, to discuss and resolve issues arising. Up to 7 days. Recommendation: The case officer will prepare a written summary of their recommended LPA decision. 7 days. Decision: A second officer (not the case officer) will review the recommended decision, raise any issues of concern with the case officer and, if there are none or these issues are resolved, issue the decision 1-2 days.	Please refer to the Applicant's response to Essex County Council above.
			Suffolk County Council For an understanding of SCC's process for the discharge of requirements ("DOR") in detail, please find SCC's process guidance for DOR in APPENDIX 1. In brief, upon receipt of the discharge documents and formal application for the DOR, SCC will consider the consultees required, the timeframe, and any deeming clause (2 days). Following this, SCC will provide statutory consultee with 21 days (as standard) for consultees to respond, providing additional time where required (including for bank holidays). SCC will consult the relevant service areas within the Council (timeframe as	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			above) to ensure full consideration of the Requirement and request feedback on whether any amendments are required for determination. SCC will also consult the relevant District or Borough Council, regardless of whether this is specified in the Requirement. Following the receipt of feedback, and resolution if any changes are required (up to 20 days), SCC will write an Officer Delegated Summary (3 days) detailing the determination and the rationale. This document is then sent through a review and approval process (3 days). The DOR may specify a short time period in which "further information" may be requested. In the experience of the Council, in each subsequent DCO this time period shortens and has become a threat to the timely determination of DOR applications. In the National Grid (Bramford to Twinstead Reinforcement) Order 2024, this period is 7 working days following receipt of the application. This effectively elongates the initial consideration of the relevant Requirement, as the relevant discharging authority must consider whether any further information is required as a matter of priority and hence results in a substantive delay for the consultation period (as such SCC includes additional time, if such a clause is included in the DCO). In the experience of the Council, the DOR process typically requires between 29 and 54 days. As such, SCC cannot sufficiently consider any DOR application within 28 days. The Bramford to Twinstead Reinforcement Order specifies a period of 35 days, which has been tested. In practice, the period of 35 days has been counterproductive to prompt delivery with insufficient time for objections to be resolved resulting in extensions (agreed for 85-90% of DOR applications) or rejections (5 occurrences). Therefore, SCC considers that a decision period of 56 days to be more conducive than 28 or 35 days to the delivery of critical energy infrastructure. Further detail on this matter can be found in SCC's Deadline 2 submission in Table 5, item 5.43 **[REP2-040]**.	
			Tendring District Council TDC supports the ExA's concern regarding the unacceptable length of many of the time periods contained in the draft DCO especially where the expiration of a time period is linked to deemed consent. Timeframes set out in the DCO must be sufficient for TDC and district authorities to register (5 working days), consult with stakeholders (15 working days), consider responses and seek amendment, if necessary (10	Please refer to the Applicant's response to Essex County Council above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			working days), write reports and arrange for decisions to be issued (5 working days). Based on ECC's direct experience with the discharge of requirements for Longfield Solar Farm NSIP and Bramford to Twisted NSIP, while extensions of time are often agreed through good working relationships, the discharge of the requirements is best facilitated on a strong, collaborative working partnership with the Applicant. TDC consider that 56 days (8 weeks) would be a reasonable period to facilitate the efficient processing of Requirements. TDC would also highlight that in many instances decisions on the discharge of requirements will be made before the 56 days period being requested.	
DCO 1.A7	The applicant All local authorities APs and IPs	**Article 2 (Interpretation) (order land)** The definition of 'Order land' is not sufficiently clear to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). The consequence of the definition being unclear could result in allowing for the acquisition or temporary use of such land unintentionally. Should 'Class 8' (Uncoloured (White) Land), as set out in the **SoR [APP-059]** at Table 5.1 (Powers related to land acquisition and use being sought by the Project) be specifically defined and excluded in these articles or through the definition of 'Order land'?	**Essex County Council** ECC acknowledges the need for clarity around 'order land' and would suggest that that the definition of Order Land is amended to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). It is suggested the definition could be Order Land means with the exception of uncoloured land (Class 8 - Land not subject to powers of acquisition nor temporary use) the land shown on the land plans and described in the book of reference". **South Norfolk District Council** Any ambiguity in the definition of "Order land" increases the risk that land within South Norfolk beyond what is genuinely necessary for the project could be unintentionally affected by CA/TP powers. Therefore, the definition of "Order land" should be tightened. **Colchester City Council** CCC acknowledges the need for clarity around 'order land' and would suggest that that the definition of Order Land is amended to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). It is suggested the definition could be Order Land means with the exception of uncoloured land (Class 8 - Land not subject to powers of acquisition nor temporary use) the land shown on the land plans and described in the book of reference". **Thurrock Council** The use of CA or TP should be restricted to circumstances where it is absolutely necessary and meets the applicable policy requirements. Article 2 should not be drafted in a way that gives rise to	The Applicant refers to its response to DCO 1.A7 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and maintains its position that further amendments to the definition of 'Order land' are not necessary.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			uncertainty and CA/TP should not be applied unintentionally by the Applicant. It is a reasonable request for these powers to be subject to clear and precise drafting in the draft DCO.	
			Braintree District Council BDC share the ExA's concerns. BDC consider that the issue can be addressed by defining the "Order land" to exclude 'Class 8' – with relevant Articles in Part 5 of the dDCO referable in turn	
			Tendring District Council TDC acknowledges the need for clarity around 'order land' and would suggest that that the definition of Order Land is amended to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). It is suggested the definition could be Order Land means with the exception of uncoloured land (Class 8 – Land not subject to powers of acquisition nor temporary use) the land shown on the land plans and described in the book of reference".	
			Babergh and Mid Suffolk District Council Defer to the response from SCC	The Applicant notes the comments made by Suffolk County Council (SCC) to which Babergh and Mid Suffolk District Council defer.
			Suffolk County Council The definition of "Order land" in the **draft DCO [REP2-005]** is "the land shown on the land plans and described in the book of reference." [Emphasis added]. The land plans **[AS-005]** to **[AS-012]** define the uncoloured (white) land as "Class 8 – land not subject to powers of acquisition nor temporary use" and, in Sheet 1 of 13 of **[AS-005]** that land is shown outside the Order limits (i.e. outside the redline). Owing to this, SCC does not consider the uncoloured (white) land on that Sheet could be unintentionally acquired or temporarily used. Similarly, in the **Book of Reference [AS-019]**, the uncoloured (white) land is described as "Class 8 – Land that is not subject to powers of acquisition nor temporary use". In respect of Sheet 1, since the land is not to be subject to those powers, SCC does not consider they could be used unintentionally. SCC would stress it has only considered this question in the context of Sheet 1 of 13 of **[AS 005]** and reserves its right to consider this question again in the light of the Applicant's reply to it. If the ExA remains concerned by the prospect of the inadvertent acquisition or use of the uncoloured (white) land, it could propose that the definition of "Order land" is	The Applicant welcomes SCC's recognition that the way in which the definition, together with the **2.2 Land Plans [Revision C]** and the **4.3 Book of Reference [Revision C]**, work together could not mean that the white land could be acquired or temporarily used unintentionally. The Applicant maintains its position that further amendments to the definition of 'Order land' are not necessary.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			recast as "the land shown on the land plan which is within the limits of land to be acquired or used temporarily and described in the book of reference" Similar wording was used in article 2(1) of the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (SI 2024/393), though that definition did not include the words "or used temporarily."	
DCO 1.A10	The applicant All local authorities	**Article 2 (Interpretation) (Relevant Planning Authority)** Norfolk CC in its **RR [RR-2753]** and its **LIR [REP1-173]**, as well as a number of other local authorities have raised concern over the definition of 'Relevant Planning Authority'. As the proposed development is a long linear scheme there will be multiple authorities involved. A number of requirements proposed use the phrase 'No stage of the authorised development may be commenced until… has been submitted to and approved by the relevant planning authority'. The ExA seeks greater clarity from both the applicant and all local authorities on the following: a) What constitutes a 'stage' of the authorised development. The ExA in asking this question notes the 'Works' are defined in schedule 1 and the proposed development has been divided into Sections A to H, covering a geographical split. It also notes image 4.1 of **[APP-130]** provides an indicative construction programme for the various sub-elements and there are different stages of the proposed development (the definition of have construction, operation and (potentially) decommissioning). Would these adequately cover the definition of a 'stage'? b) Which local authorities would be the relevant planning authorities for a particular stage, bearing in mind the length and size of the proposed development at that stage? For example what happens if more than one authority (such as a County Council and a Local Authority) is involved in discharging a requirement/ plan/ scheme for a particular stage and they disagree that the submission is adequate to allow for the development to commence? c) Consider a requirement for a 'stages plan' to be submitted in writing prior to commencement, for the written approval of the relevant determining body (similar to the provisions set out on the Brechfa Forest Connection Project DCO, the Brechfa Forest West Wind Farm DCO and the Richborough connection Project	**Essex County Council** a) ECC considers clarity is needed on what would constitute a 'stage' of development to ensure transparency for all stakeholders. This is due to the vast scale and diverse elements of the proposed scheme. The definition of "stage" in Schedule 3, para 1 is circular in that it is referable to a scheme of works submitted by the Applicant to [x] relevant planning authority. Thus, the stages are set by details submitted by the Applicant. It is unclear how "stages" correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify. ECC would also welcome the Applicant engaging with the local authorities in respect of their programme of requirements and construction works. This will increase the transparency around the works which are expected to be undertaken, and where construction impacts may be felt and when. b) The answer to this is predicated on what a "stage" is – as noted in part a) above. Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12). It is recommended that there is consideration of a local administration discharge, with relevant county council also engaged. c) ECC would be supportive of a requirement for a stages plan – to be submitted and approved by the relevant authority prior to the commencement of works. It is considered that this would be preferable to the above, providing clarity/certainty if the Application is allowed. ECC notes that it will be a challenging scheme to manage given sections include multiple district / county authorities (and local highway authorities). Adequate time must be allowed for any discharge to ensure necessary liaison between	a) The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** For the purposes of Requirement 3, a 'stage' is not intended to be a fixed subdivision of the authorised development by reference to Work Nos. Instead, a stage is a delivery-led concept likely to be linked to a particular package of works that will be carried out. The Applicant has prepared a draft written scheme of stages, which is being consulted on with the host local authorities. This document sets out a proposed division of stages and sub-stages, including their relation to the construction programme, geographic extents and the anticipated sequencing of works. b) The Applicant updated the definition of 'relevant planning authority' in **3.1 Draft Development Consent Order (Revision C) [REP3-004**] which was submitted at Deadline 3. In cases where more than one planning authority is engaged for a single stage, the Applicant will, where practicable, seek to define sub-stages aligned to specific geographical areas to minimise the complexities associated with cross-boundary approvals and reduce the potential for disagreement between different local authorities. c) The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074**] in which it addresses why it is not appropriate for stages plans to be approved by the planning authorities. The Applicant will continue to engage proactively with local authorities, including through the ongoing

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		DCO), to approve the staging plan prior to commencement of works. The ExA invites suggestions as to any alternative wording and/ or solutions that would address the ExA's concerns in regard to the above-mentioned matters.	relevant district / county authorities and relevant consultees, with open dialogue as may be required to resolve any issues which may occur. **Norfolk County Council** NCC's concerns mentioned in the question remain as they have not been addressed in the changes to the DCO submitted by the applicant at Deadline 2. a) NCC agrees with the ExA that it is not presently clear exactly what the requirement stages are. To some extent, it is acceptable for this to be left open-ended so that the applicant can pursue a strategy for discharging requirements that suits the needs of the delivery phase of the project. Notwithstanding this, NCC also agree that some clarification from the applicant would be welcome as to whether stages are intended to be temporal or geographical splits. b) NCC considers that requirements should be drafted in such a way that there can only be one body understood to be the discharging authority for a given submission. NCC has already raised concerns about the ambiguity of the term "relevant planning authority", though it should be noted that "relevant" is not the ambiguous part of the term. This is because, for example, "relevant planning authority" means in any given provision of this Order, the local planning authority for the area to which the provision relates and any successor in function. For NCC the implication of this is that provisions apply severally to different areas. Where a discharge application is submitted to one or more area-based discharging authorities, that discharging authority only discharges the application insofar as it relates to their area. If a requirements stage is drawn in a way that would cover multiple areas, then different decisions by the respective authorities would mean that the development could commence only in the areas for which the requirement has been discharge. c) NCC understands this to be the purpose of requirement 3, but we are interested in the practical difference between this and the Brechna Forest Connection Project DCO **Braintree District Council** The Council respond using the same sub-numbering: a) The definition of "stage" in Schedule 3, para 1 is circular in that it is referable to a scheme of works submitted by the Applicant to [x] relevant planning authority. Thus, the stages are set by details submitted by the Applicant. It is unclear how "stages"	consultation on the draft written scheme of stages, to ensure that authorities are informed of and able to input into the development of the staging plan.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify. b) The answer to this is predicated on what a "stage" is – see above. Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12). c) BDC consider that this would be preferable to the above, providing clarity/certainty if the Application is allowed.	
			Tendring District Council a) TDC considers clarity is needed on what would constitute a 'stage' of development to ensure transparency for all stakeholders. This is due to the vast scale and diverse elements of the proposed scheme. The definition of "stage" in Schedule 3, para 1 is circular in that it is referable to a scheme of works submitted by the Applicant to [x] relevant planning authority. Thus, the stages are set by details submitted by the Applicant. It is unclear how "stages" correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify. TDC would also welcome the Applicant engaging with the local authorities in respect of their programme of requirements and construction works. This will increase the transparency around the works which are expected to be undertaken, and where construction impacts may be felt and when. b) The answer to this is predicated on what a "stage" is – as noted in part a) above. Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12). It is recommended that there is consideration of a local administration discharge, with relevant county council also engaged. c) TDC would be supportive of a requirement for a stages plan – to be submitted and approved by the relevant authority prior to the commencement of works. It is considered that this would be preferable to the above, providing clarity/certainty if the Application	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			is allowed. TDC notes that it will be a challenging scheme to manage given sections include multiple district / county authorities (and local highway authorities). Adequate time must be allowed for any discharge to ensure necessary liaison between relevant district / county authorities and relevant consultees, with open dialogue as may be required to resolve any issues which may occur.	
			Chelmsford City Council The definition of "stage" in Schedule 3, para 1 is circular in that it is preferable to a scheme of works submitted by the Applicant to [x] relevant planning authority. The stages are set by details submitted by the Applicant. It is unclear how the "stages" correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify and define as it's not clear. Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12). CCC consider that this would be preferable to the above, providing clarity/certainty if the Application is allowed." In CCC's experience, defined works lend themselves to the physical complements of a Project, such as Solar Farm site, substation, underground cabling, whilst the stages provide the timing and the detailing for undertaking the works within and may include pre construction, construction, operation etc, with phasing / staging broken down further as necessary. To ensure a manageable discharge of requirement process, CCC considers that the works should be broken into geographical areas (sections) according to the current LPA administrative areas, with high level documentation geographically themed at geographical County level. This would make transition under Local Government Reorganisation (LGR) more simple to deal with, as each of the affected Discharge Authorities could continue to deal with their current workloads and requirements. Roles that were previously undertaken by County Council such as Highways, could in theory, continue geographically at local level Currently Chelmsford is blended into sections F and G which is ambiguous. Chelmsford is proposed to be merged with Brentwood (and Maldon) as part of LGR, but	The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In relation to local government reorganisation, the Applicant recognises that administrative boundaries may change over the lifetime of the Project and that this has the potential to affect how responsibilities for requirement discharge are exercised. The Applicant considers that the proposed, delivery-led approach to staging, supported by the use of geographically defined sub-stages where appropriate, provides a more robust and future-proof mechanism than fixing stages strictly by current administrative boundaries.

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			section G also includes Basildon whom would be in a different administrative area upon LGR. CCC considers the phases need to relate to each Authority. A phasing plan is required to advise when requirements will be submitted and how they relate to each administrative area.	
			South Norfolk District Council SNDC make the following comments: a) SNDC have no comments to make on the stages of the development proposed. b) In our experience, the discharge of the requirements are submitted to the Local Planning Authority and to date this has not caused an issue. SNDC have no comments to make on a requirement for the submission of a stages plan.	The Applicant notes South Norfolk District Council's comments.
			Colchester City Council The definition of "stage" in Schedule 3, para 1 is circular in that it is referable to a scheme of works submitted by the Applicant to a relevant planning authority. Thus, the stages are set by details submitted by the Applicant. It is unclear how "stages" correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify. The answer to this is predicated on what a "stage" is – see above. Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12). CCC consider that this would be preferable to the above, providing clarity/certainty if the Application is allowed.	The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. For the purposes of Requirement 3, a 'stage' is not intended to be a fixed subdivision of the authorised development by reference to Work Nos. Instead, a stage is a delivery-led concept likely to be linked to a particular package of works that will be carried out. The Applicant has prepared a draft written scheme of stages, which is being consulted on with the host local authorities. This document sets out a proposed division of stages and sub-stages, including their relation to the construction programme, geographic extents and the anticipated sequencing of works.
			Thurrock Council The Council believe the definition of construction, operation and de-commissioning covers the stages adequately. A suggestion from the Council is that the Applicant should identify which local authorities are relevant for each stage and section. The Applicant should also clarify if the Article 62 (Arbitration) process is to be followed in the event that there is a disagreement between Local Authorities on the discharge of a requirement(s). Article 62(1) (Arbitration) provides that it is subject to Article 55 (Procedure regarding certain approvals etc), which at paragraph (2) refers to Schedule 4 (discharge of Requirements). The	The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant considers that **3.1 Draft Development Consent Order [Revision D]** already provides mechanisms suitable to account for an event in which local authorities cannot reach agreement on the discharge of a particular requirement.

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			Applicant should clarify if it is open to adding drafting to Article 55 that provides for a dispute process between Local Authorities. A requirement for a "stages plan" would be considered helpful to the Council as it will provide further detail on the sequencing of Scheme works. Should the Applicant not believe this is required, they should explain why.	
			Babergh and Mid Suffolk District Council BMSDC note that 'Stage' is defined in the dDCO, Rq3 (1) but, based on experience of similar projects such as Bramford to Twinstead, a stage is not necessarily defined by geographical area. For example, it is likely that the first stage would be the construction of the main and satellite construction compounds along the route, followed by access and temporary haul route works to enable delivery off the main highway network as soon and as much as possible. It may be appropriate for the applicant to subdivide a works type into geographically specific sub-stages to avoid any delay in delivery resulting from the need to secure approval from all discharging authorities hosting the works type. BMSDC note the references to, and definitions of 'planning authority' and discharging authority' in the dDCO, which, in some cases, may be the same party. BMSDC suggest that, with some minor clarification to the dDCO, such that works do not commence until approval from all the relevant discharging authorities for the stage or sub stage are issued, similar to the procedure for determining a cross-boundary TCPA planning applications, thereby avoiding ambiguity and undue complexity. In our experience, BMSDC has worked collaboratively with SCC to discuss and resolve areas of concern, whilst respecting the 'lead' authority role of the council to who the primary function falls (e.g rights of way matters to the County and ecology matters to the Districts). This need not be unduly onerous or complex provided communication is managed appropriately by all parties. BMSDC suggest that the DCO should be worded so as to allow for revised stages plan(s) throughout the delivery phase as necessary, to respond to the realistic practicability of delivery by the appointed contractor(s) and delivery schedule delays that may arise, such as unforeseen weather or seasonal windows.	The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. For the purposes of Requirement 3, a 'stage' is not intended to be a fixed subdivision of the authorised development by reference to Work Nos. Instead, a stage is a delivery-led concept likely to be linked to a particular package of works that will be carried out. The Applicant has prepared a draft written scheme of stages, which is being consulted on with the host local authorities. This document sets out a proposed division of stages and sub-stages, including their relation to the construction programme, geographic extents and the anticipated sequencing of works. The Applicant updated the definition of 'relevant planning authority' in **3.1 Draft Development Consent Order (Revision C) [REP3-004]** which was submitted at Deadline 3. The Applicant welcomes Babergh and Mid Suffolk District Council's proposed collaborative working. Requirement 3 (stages of development) already includes provision for amendments to staging both pre- and post-commencement.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Suffolk County Council SCC considers the Applicant is best placed to explain what constitutes a "stage" of the authorised development and looks forward to the Applicant's response. SCC notes neither the draft DCO **[REP2-005]** nor the Explanatory Memorandum **[REP2-007]** provide an explanation. SCC notes paragraph 1(1) of Schedule 3 (requirements) to the draft DCO **[REP2-005]** defines "stage", for the purposes of that schedule as (unless the context requires otherwise) "a defined stage of the authorised development, the extent of which is shown in a scheme submitted to the relevant planning authority pursuant to requirement 3". By requirement 3(2), the authorised development may not commence "until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority". There is no timeframe for providing this scheme and so, as drafted, the relevant planning authority could be provided with it very shortly before commencement, even the day before. The written scheme is merely submitted to the relevant planning authority; the relevant planning authority has no role in determining whether it is satisfactory. Moreover, as drafted, no notice would be served on SCC. SCC would therefore invite the Applicant to revisit the drafting of requirement 3(2) to ensure a reasonable timeframe for the submission of the written scheme is included in the requirement and to make it clear that SCC will receive a copy of the scheme at the same time as the relevant planning authority. This is addressed further in the reply to part (c) of this question. Again, SCC considers the Applicant is best placed to explain which local authority would be the relevant planning authority for a particular stage. It seems to SCC that, if more than one authority is involved in discharging a requirement for a particular stage and they disagree that the submission is adequate to allow for the development to commence, the refusal would have to prevail and the Applicant would either have to resubmit the application to discharge in a form that was satisfactory to both authorities or it would have to be appeal the refusal under paragraph 4 (appeals) of Schedule 4 (discharge of requirements) of the **draft DCO [REP2-005]**.	The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. For the purposes of Requirement 3, a 'stage' is not intended to be a fixed subdivision of the authorised development by reference to Work Nos. Instead, a stage is a delivery-led concept likely to be linked to a particular package of works that will be carried out. The Applicant has prepared a draft written scheme of stages, which is being consulted on with the host local authorities. This document sets out a proposed division of stages and sub-stages, including their relation to the construction programme, geographic extents and the anticipated sequencing of works. The Applicant notes the comment about the notice period for the submission of the phasing scheme prior to commencement but does not consider it necessary to provide a timescale. The Applicant is, instead, required to provide notice of commencement within five business days of commencement having taken place. This approach is consistent with that in the National Grid (Bramford to Twinstead Reinforcement) Order 2024, although the Applicant has agreed to provide notice of commencement more quickly than was required in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (which was 10 business days). The Applicant updated the definition of 'relevant planning authority' in **3.1 Draft Development Consent Order (Revision C) [REP3-004]** which was submitted at Deadline 3. In cases where more than one planning authority is engaged for a single stage, the Applicant will, where practicable, seek to define sub-stages aligned to specific geographical areas to minimise the complexities associated with cross-boundary approvals and reduce the potential for disagreement between different local authorities. The Applicant refers to its response to DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in which it addresses why it is not appropriate for stages plans to be approved by the planning authorities.

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			Requirement 4(1) (stages of authorised development) of the Brechfa Forest Wind Farm Connection Order 2016 (SI 2016/987) states – "No authorised development may commence until a written scheme setting out all the stages of the authorised development has been submitted to and approved by the relevant planning authority, after consultation with the relevant highway authority". Requirement 4(1) of the National Grid (Richborough Connection Project) Development Consent Order 2017 is identical. SCC considers a provision the same of Requirements 4(1) of Brechfa and Richborough would be acceptable here because it allows the relevant planning authority to approve the scheme. An alternative approach was followed in the Gatwick Airport (Northern Runway Project) Development Consent Order 2025 (SI 2025/1054) which includes the following requirement, where a "stage" is referred to as a "phase" – "The authorised development must not commence unless, no less than four months prior to the anticipated date of commencement, a phasing scheme setting out the anticipated phases for construction of the authorised development has been submitted to the host authorities and National Highways". (Requirement 2(1) (phasing scheme) of Schedule 2 (requirements). [Emphasis added]. In Gatwick, there is not an approval mechanism; however, there is a reasonable time frame (no less than 4 months) between date of submission of the phasing scheme and commencement. Absent an approval provision, SCC considers no less than four months' notice would be reasonable because it would allow the affected local authorities to ensure their resources are arranged appropriately in advance of having to discharge any requirement. The reasonableness of the time period is reinforced by the scale of the indicative construction programme included in image 4.1 of **[APP-130]**. Based on the Gatwick DCO precedent, SCC considers requirement 3(2) could be amended as follows – "(2) The authorised development may not commence unless, no more than four months prior to the anticipated date of commencement, until a written scheme setting out all stages of the authorised development has been submitted to the host authorities relevant planning authority".	The Applicant will continue to engage proactively with local authorities, including through the ongoing consultation on the draft written scheme of stages, to ensure that authorities are informed of and able to input into the development of the staging plan.

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			If "host authorities" is only used in this sub paragraph, it should be defined in requirement 3 as follows – "(6) In this requirement "host authorities" means Mid Suffolk District Council, Babergh District Council, Suffolk County Council, Braintree District Council, Chelmsford City Council, Brentwood Borough Council, Basildon Borough Council, Thurrock Council, Essex County Council, South Norfolk Council and Norfolk County Council."	
DCO 1.A16	The applicant Relevant local authorities	**Article 5 (Limits of deviation) - 2** Provide an update with regards to the potential for pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) and whether an 18 metre vertical limit of deviation will be required, should a change from low height pylons to standard height pylons be required. The explanatory memorandum (EM) **[APP-057]** suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised. In addition, the following wording has been used multiple times in this article "… to such extent the undertaker considers necessary or convenient", with two of those instances also including the word 'downwards'. In terms of precision and enforceability, the ExA raises concerns with the applicant in regard to the wording used and ask it be reviewed and amended, as may be necessary. In regard to the above concerns, the local authorities are invited to submit their views on this matter and request they submit alternative wording for consideration, should they wish.	**Essex County Council** ECC would support the concern expressed by CCC in its LIR regarding the uncertainty surrounding the final height and design proposed for the pylons proposed in this vicinity in the vicinity of 'the Walthams' and would defer to CCC in terms of providing an update on the current position. ECC is concerned with the use of "to such extent the undertaker considers necessary or convenient" which it feels is too ambiguous. ECC therefore considers such wording would not be sufficiently precise to support enforcement should that situation arise. ECC is of the opinion that the following wording could be used instead "to such extent the undertaker considers necessary and the proposed alteration would not raise any new or materially different environmental or amenity considerations".	The Applicant committed at Deadline 3 to replace three low height design lattice pylons (TB140 to TB142 inclusive) with two standard height pylons and **3.1 Draft Development Consent Order [Revision D]** will be updated accordingly at Deadline 5. The Applicant refers to its response to DCO 1.A16 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in which it sets out its position on the term 'to such extent the undertaker considers necessary or convenient'. The Applicant notes Essex County Council's request for additional wording regarding any new or materially different environmental or amenity considerations. The Applicant will consider whether it is appropriate and necessary to include wording of this nature and will provide an update at Deadline 5.
			Chelmsford City Council CCC expects LVIA assessment to reflect this deviation and for the project description to be updated to inform the visual envelope of maximum parameter. We expect an updated ZTV and the study area to respond appropriately to the finding of the revised ZTV. CCC considers that precise wording and clarification on the consultation and notification process is needed. The memorandum relates to consultation only, but it does not follow that the consultation responses will be taken into account and incorporated. CCC suggests that a formal process is needed and suggests a requirement process would be best suited to facilitate this process. The following requirement wording is suggested Great Waltham and Little Waltham – Pylons TB140 – 142 (inclusive) 1. No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of— a) the layout;	The Landscape and Visual Impact Assessment (LVIA) visualisations show the design as presented in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and **2.3 Works Plans Sections A and B [APP-017 and APP-018]**, **Section C [Revision B]**, **Sections D to G [APP-020 to APP-023]** and **Section H [Revision B]**. As for all technical disciplines, the assessment included sensitivity testing to judge if changes within the Limits of Deviation (LoD) would change the findings of the assessment in terms of levels of significance. Preparation of further Zone of Theoretical Visibility (ZTV) maps modelled to different heights would not assist in informing the assessment, given it is just one of a number of tools which the assessors use to make their judgements. A ZTV is a starting point to help direct desk studies and field work to the appropriate parts of the study area, and is considered to overstate potential visibility given it does not take account of all vegetation – for example hedgerows are not modelled in.

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			b) scale (including height); c) proposed finished ground levels; d) external appearance; e) hard surfacing materials; f) Consultation Report advising of the change to the pylon height and (i) programme for landscaping works, relating to Pylons TB140 – TB142 (inclusive) have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.	For example, a ZTV for a lower height pylon would suggest a marginally reduced extent of visibility, in terms of geographical area (given this is dictated by landform and height of the proposed structure, with potential visibility). Conversely it may indicate a marginally larger area for taller structures. What it could not indicate, however, is that in closer views a lower height pylon may appear more visible, given its different design. Such considerations inform judgements made by assessors, based on their understanding and experience, and go well beyond what a relatively coarse ZTV tool can show. As such re-running the ZTV would not be considered necessary or useful in this instance. The Applicant committed at Deadline 3 to replace three low height design lattice pylons (TB140 to TB142 inclusive) with two standard height pylons and **3.1 Draft Development Consent Order [Revision D]** will be updated accordingly at Deadline 5.
			Norfolk County Council The named pylons are outside of Norfolk, so NCC defers to the local authorities in whose areas these pylons would fall. NCC assumes the intent of the provisions allowing downwards vertical deviation to be that there is effectively no limit to the downwards vertical deviation of pylons, because downwards vertical deviation tends towards lesser landscape and visual effects and because there is a practical floor for engineering reasons. If this is the case, the function of the wording is essentially for the avoidance of doubt only. It does not need to be particularly precise or enforceable because in practice there is no degree of downwards vertical deviation against which enforcement action is envisaged to be taken. NCC can see how this approach might be acceptable, but only if it can be confirmed that the direction of the deviation is in all cases away from the worst case environmental impact. NCC would appreciate if the applicant could indicate where in the ES or other application documents this is set out. This is less obviously the case where the deviation is not specifically downwards, for example in the case of 5(1)(c) which provides that the undertaker may: "in respect of the overhead conductors and fibre-optic earth wires deviate vertically to such extent as the undertaker considers necessary or convenient".	The downwards Limits of Deviation for the overhead electric line conductors will be regulated by the Electricity Safety, Quality and Continuity Regulations 2002 which ensure that a strict safety clearance is maintained. Flexibility downwards '*to such extent as the undertaker considers necessary or convenient*' is also essential for the underground cables, as it allows for localised changes in landform, geology or agricultural practices to be taken into account during construction. It also allows the Applicant to ensure that a safe distance can be maintained relative to any existing buried utility apparatus. Likewise, this form of flexibility is required for other permanent above ground structures, erections and apparatus, including substations and Cable Sealing End compounds. As for the underground cables, this is required so that construction can reflect extant ground conditions when the works are carried out. The flexibility afforded here is well precedented in made electricity transmission Development Consent Orders (DCOs), including the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and, in respect of underground works, in pipeline and tunnel DCOs including the HyNet Carbon Dioxide Pipeline Order 2024 and the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Thurrock Council The Council considers the wording "to such extent the undertaker considers necessary or convenient" to be concerning as this affords the Applicant discretion in imprecise terms. In Article 5(1)(b)(ii), where the wording applies to downward deviation, this would not be a problem as it would result in lower visual effects. The wording is also included in Article 5(1)(c) and Article 5(1)(3)(b) vertically and upwards respectively. The Council's concern here would be that the Applicant may gradually add in this wording throughout the Article to secure this discretion in its decision-making. Upwards and vertical changes to apparatus that forms part of the Scheme may give rise to new environmental effects. The Applicant's drafting grants decision-making power that is only mindful of commercial factors and does not account for environmental issues such as landscape and visual effects. Changes in the height of the Scheme apparatus that increase its height should only occur if there is no other reasonable alternative and the drafting should reflect this.	The Applicant would clarify that the wording at article 5(1)(c) is essential because the height of the conductors and earth wires is entirely dependent on (a) the distance between the pylons, (b) the height of the pylons (which are subject to their own Limits of Deviation (generally being 6 m upwards) and (c) safety clearance heights with which the Applicant has a statutory duty to comply. The pylon height will always be the maximum height because the conductors and earth wires have a degree of sag between the pylons. In relation to 5(3)(b), the upwards Limit of Deviation is capped at a maximum of 10% above the height shown on the Table of Parameters. Note 6 on the Table of Parameters states that non-linear infrastructure located within substations and Cable Sealing End compounds have a 15.0 m maximum height and an upward vertical Limit of Deviation of 10% of that height, excluding rooftop equipment, such as but not limited to, lightning protection, aerials, fall arrest systems, and handrails. This flexibility is essential to account for variations in equipment specifications and required safety clearances and the full extent of this upwards Limit of Deviation has been assessed in the Environmental Statement. This approach is adopted from the National Grid (Bramford to Twinstead Reinforcement) Order 2024. In relation to the downward Limit of Deviation at 5(3)(b), the Applicant refers to its response to DCO 1.A16 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in which it sets out its position on the term 'to such extent the undertaker considers necessary or convenient'.
			Braintree District Council BDC suggest that an obligation of reasonableness is required. Namely so that in each case the wording within Article 5 dDCO is worded: "…as the undertaker, acting reasonably, considers…"	In its design, construction and operation of the authorised development, the Applicant is bound by strict safety obligations and its licence holder duties. The Applicant does not consider the proposed 'reasonableness' wording to be necessary or precise and would note that such wording was not considered necessary on the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
			Suffolk County Council SCC notes that the listed pylons are not located in Suffolk. Regarding the words "… to such extent the undertaker considers necessary or convenient", SCC assumes, if challenged, the Applicant would have to demonstrate why a particular extent was necessary or convenient. Convenient, of course, provides the Applicant with great	The Applicant notes Suffolk County Council's comments.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			flexibility and SCC will reserve its position on this point until it sees the Applicant's amended drafting. On a point of detail, the words "… to such extent the undertaker considers necessary or convenient", include the word "downwards" on three occasions: article 5(1)(b)(ii), 5(1)(d)(ii) and 5(3)(b).	
			Tendring District Council TDC would support the concern expressed by CCC in its LIR regarding the uncertainty surrounding the final height and design proposed for the pylons proposed in the vicinity of 'the Walthams' and would defer to CCC in terms of providing an update on the current position. TDC is concerned with the use of "to such extent the undertaker considers necessary or convenient" which it feels is too ambiguous. TDC therefore considers such wording would not be sufficiently precise to support enforcement should that situation arise. TDC is of the opinion that the following wording could be used instead "to such extent the undertaker considers necessary and the proposed alteration would not raise any new or materially different environmental or amenity considerations".	Please refer to the Applicant's comments on Essex County Council's response to this question above.
DCO 1.A19	All local authorities Statutory undertakers	**Article 11 (Street Works); Article 12 (Application of the Permit Schemes); Article 13 (Application of the 1991 Act)** The ExA notes the explanation provided by the applicant in its **EM [APP-057]** with regard to these articles but seeks whether the relevant Street/ Highway Authorities and/ or any statutory undertakers have any further comments, as relevant to these articles beyond the submissions in their RRs, WRs, LIRs and Deadline 1 submissions. In responding to this question, a relevant street/ highways authority or statutory undertaker should list any relevant examination library reference and paragraph numbering of their former submissions that responded to these articles.	**Essex County Council** ECC, the other local authorities and the Applicant are discussing a Framework Highways Agreement, the latest draft of which was provided in the week of 23 February 2026. ECC would be grateful for more time to consider the ExA's question and so will answer at Deadline 4.	The Applicant awaits the Council's comments on the draft framework agreement.
			Norfolk County Council Norfolk County Council has provided commentary on Article 11 in our relevant representation **[RR-2753]** (at paragraphs 3.2 to 3.5) and proposed changes in our **LIR [REP1-174]** at pages 37 and 38. The requirement for permitting should accord with the Norfolk Permit Scheme, under NRSWA 1991 and TMA 2004, with permits submitted via the government's Street Manager website.	The Applicant responded to Norfolk County Council's Relevant Representation **[RR-2753]** in its **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** (page 422) and to Norfolk County Council's comments in its Local Impact Report **[REP1-174]** in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (pages 173-174) and does not repeat its comments here. **3.1 Draft Development Consent Order [Revision D]** defines 'permit scheme' to include what the Applicant understands to be the relevant permit scheme for Norfolk.
			South Norfolk District Council Not applicable to SNDC as at the present point in time this would fall under Norfolk County Council in their capacity as Local Highway Authority.	
			Thurrock Council The Council responded to Article 11 in its LIR in Appendix A. In addition, the Council has also commented on the draft highways Protective Provisions and draft	The Applicant welcomes the Council's engagement on the draft highways protective provisions and draft framework highways agreement and continues to engage with the Council on these.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Framework Highways agreement which are currently with the Applicant to review and respond.	
			Babergh and Mid Suffolk District Council Defer to the response from SCC	The Applicant notes the comments from Suffolk County Council to which Babergh and Mid Suffolk District Council defer. The Applicant continues to engage on the draft protective provisions and draft framework highways agreement.
			Suffolk County Council The **Joint Suffolk LIR [REP1-178]** refers to article 11 in paragraphs 12.138 and 14.17 to 14.26, article 12 in paragraph 14.27 and article 13 in paragraph 14.28. SCC considers its concerns with the street works provisions of the **draft DCO [REP2-005]** can largely be addressed if a satisfactory highways agreement is entered into.	
			Tendring District Council Relevant local authorities and the Applicant are discussing a Framework Highways Agreement, the latest draft of which was provided in the week of 23 February 2026. TDC would be grateful for more time to consider the ExA's question in consultation with High Authority and so will answer at Deadline 4.	The Applicant awaits the Council's comments on the draft framework agreement.
DCO 1.A24	The applicant	**Article 16 (Temporary closure of streets and public rights of way)** In article 16(1) you use the term 'reasonable time'. In the interests of precision, define this term. In addition to the above, Norfolk CC in its **RR [RR-2753]** considers other provisions which provide for consents should also explicitly state that reasonable conditions may be applied and this article should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way is temporarily stopped up, altered or diverted. Provide a response to these concerns.	**Holton St Mary Parish Council** Holton St Mary Parish Council draws the Inspectorate's attention to the number of roads and Public Rights of Way due for managed closure to the West & East of Holton St Mary. Please see Picture 1 shown below [*see document]* of how the village will be cut-off by road closures and PoW closures. In this regard no mention is made of how the road from Raydon to HSM via Noakes road will not become a rat run. Where will traffic be diverted during managed road closures? How often and for how long with these closures take place? No details have been provided. NB there are over 5 5000 traffic movements per day on average along the B1070 through Holton. During the past road closures, smaller surrounding lanes have been damaged by large vehicles taking inappropriate diversions. How will National Grid manage this? What quantifiable mitigation? What damage repair to smaller roads is planned post construction due to excessive wear and tear? What notice will be given of closures? NB - managed closures of S-FP-144.1; S-FP-143.1; S-FP-143.2; S-FP-149.1; and S-FP 149.2. This is the only footpath from Bacons Green to Raydon and is to be subject to managed closures throughout construction. What alternatives will National Grid put in place to allow residents safe pedestrian access to the amenities in	The use of the term 'reasonable time' is well precedented in made Development Consent Orders (DCOs) including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and, to the Applicant's knowledge, has not been defined in other DCOs. The Applicant considers that it would not be appropriate to define or otherwise limit the meaning of 'reasonable time' in this instance. Instead, the term should be interpreted on a case-by-case basis, having regard to the specific circumstances at the time. This approach is justified by the need to retain sufficient flexibility during construction, particularly to accommodate unforeseen events or conditions that may arise. For example, unanticipated ground conditions, adverse weather, or the discovery of unidentified utilities may necessitate a longer period of temporary closure than originally anticipated in order to complete works safely and efficiently. In such circumstances, a fixed or pre-defined duration could unduly constrain the delivery of the authorised development and potentially give rise to safety or programme risks. For the reasons above, the Applicant does not consider it necessary to define 'reasonable time' and has instead included the following safeguards in article 16:

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Raydon for the duration of the construction? What notice of the closures will be given.	a) 16(1) – The undertaker must provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary closure, alteration or diversion. b) 16(5) – The undertaker must either consult or seek consent from the street authority before temporarily closing, altering or diverting any street or public right of way. The Applicant has also included commitments in **7.3 Outline Construction Traffic Management Plan [Revision C]** and **7.6 Outline Public Rights of Way Management Plan [Revision B]** to minimise as far as practicable the duration of temporary closures and diversions. Both management plans are secured by Requirement 4 of **3.1 Draft Development Consent Order [Revision D]**. The road closures and their proposed diversion routes are shown in the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to 040]. Where temporary road closures and diversions are required, these will be undertaken as set out in **7.3 Outline Construction Traffic Management Plan [Revision C].** This commits to coordinating all temporary traffic management with the relevant Highway Authority through the Permit Schemes. These established processes ensure that closures are kept to the minimum required, are coordinated to maintain access and minimise disruption, and that users are informed through appropriate signage and communication measures. In relation to Norfolk County Council's concerns raised in Relevant Representation **[RR-2753]**, the Applicant firstly wishes to highlight that the drafting of article 16 is well precedented in previous made DCOs as set out in **3.2 Explanatory Memorandum [Revision D]**. Secondly, the Applicant is not proposing to construct any temporary streets to be used as diversions and instead proposes to only use existing streets. In relation to Public Rights of Way, details regarding management regimes, mitigation and durations of impacts are contained within **7.6 Outline Public Rights of Way Management Plan.** The overall strategy is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through appropriate temporary diversions. As a result, no PRoW within Suffolk would be subject to closure without a diversion in place, and no severance of the overall network is anticipated. In the case of the PRoW route identified, this would be kept open under a managed regime, rather than fully closed,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				and will therefore remain accessible throughout construction on its existing alignment, subject to appropriate safety measures. Managed access may include brief holding of users while specific construction activities are paused, controlled access through working areas, or minor localised diversions around works to ensure safe passage. Regarding communication, advance notice of any temporary restrictions will be provided in accordance with the detailed contained in **7.6 Outline PRoW Management Plan [Revision B]** and the community engagement measures set out in the **7.2 Outline Code of Construction Practice [Revision D]** and its **Appendix E – Community Engagement and Public Information [APP-305]**. This will include on-site signage and wider community engagement as well as updates via the project website, letter drops, emails and dedicated community liaison channels to the Local Highway Authorities and Parish Councils.
DCO 1.A35	The applicant All local authorities	**Article 48 (Defence to proceedings in respect of statutory nuisance)** The **DASSI [APP-354]** is noted, however, the ExA is concerned with regard to this article in the absence of any finalised design of the proposed substations, especially in the light of ES chapter 14 (noise and vibration). The ExA seeks certainty that the resultant noise impacts arising from the substations will be adequately mitigated within the design of those substations. Explain how that certainty can be provided in the absence of any finalised design of the substations. All local authorities are also invited to provide their views in relation to article 48.	**Essex County Council** ECC shares the ExA's concerns regarding the potential for noise to impact the amenities of local residents especially in the absence of details for the detailed design of the EACN. The potential for harm arising from operational noise is heightened by the presence of the EACN substation in combination with the substations serving the North Falls and Five Estuaries wind farms within the immediate vicinity, together with the existing Lawford Substation. This cumulative context would be further intensified by the proposed Tarchon interconnector, which, should it receive development consent, is intended to be located in close proximity to these three developments. It is noted that the applicant has provided the latest Draft Onshore Substations Operational Noise and Outline Noise Complaints Protocol (Rev. D). This is attached as Appendix C. Throughout the examinations of both the Five Estuaries and North Falls projects, ECC and TDC have consistently and clearly expressed that the proposed tripartite noise complaints protocol, in its current form, is not acceptable. In particular, concerns have been raised that the protocol lacks a genuinely joint panel approach to complaints assessment and includes investigation and response timescales that are unacceptably lengthy. ECC and TDC consider that these shortcomings would fail to provide adequate and timely protection of local residents' amenity.	Please refer to the Applicant's response to DCO 1.A35 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. An assessment of operational noise from the proposed East Anglia Connection Node (EACN) substation is provided in **6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259]**. Although the assessment is framed as indicative, it is in fact worst-case. The assessment considers the highest allowable source noise levels based on National Grid specification data (i.e. noise levels can be no higher than the specification level). Additionally, mitigation in the form of standard acoustic enclosures is assumed. These are specified to provide an attenuation of at least 20 dB at 100 Hz (the main sound generating frequency from transformers). Based on these assumptions, significant adverse effects are not expected. The assessment also includes a cumulative assessment with the North Falls and Five Estuaries substations. No significant adverse cumulative effects from operational noise are expected. Operational noise limits are included in Requirement 14 of **3.1 Draft Development Consent Order [REP3-004]** based on the agreed noise limits to avoid a significant cumulative effect, noting that the assessment shows that these are comfortably met. Additionally, Requirement 14 of **3.1 Draft Development Consent Order [REP3-004]** requires that a noise investigation protocol is submitted to and approved by the relevant planning authority prior to the

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			As such, the protocol will require substantive revision before it could be considered acceptable for certification and implementation. Any final protocol must ensure a robust, jointly managed and responsive process that prioritises the effective resolution of complaints and safeguards residential amenity. It is intended that a revised and final protocol, addressing these concerns, would be prepared and submitted to the relevant local planning authority prior to operation and secured as a certified document within each Development Consent Order.	commencement of operation of the EACN substation. The Applicant will continue to engage with the relevant local authorities regarding the noise complaints protocol. The Applicant also notes that the operational noise level limits in the Requirement 14 of **3.1 Draft Development Consent Order [Revision D]**, and the cumulative 35 dB $L_{Ar,Tr}$ cumulative noise rating limit are very low; substation noise is unlikely to be audible inside any residential dwelling, and there is no evidence that noise exposure at this level could cause annoyance. Hence, occurrence of complaints regarding normal substation operations are considered extremely unlikely. As compliance with these limits will be a legal requirement ensured through the substation design process, operational noise should only exceed its limits if a fault has developed in one or more items of plant. Section 6.4 of the Noise Protocol **[REP3-081]** identifies that the first stage in the process would be to undertake a site walkaround to identify any equipment operating incorrectly, within 48 hours of receipt of a complaint. All three substations will be unmanned; hence this timeframe is the minimum that would be achievable. It is considered extremely likely that the initial site walkaround would identify any equipment faults, and Section 6.5 of the Noise Protocol **[REP3-081]** states that initial remedial measures must be considered. The timeframes identified in Section 6.6 of the Noise protocol **[REP3-081]** recognise the likely technical complexity of such a scenario and the high degree of individual expertise and equipment precision required to undertake such an investigation. Such resources are of limited availability; hence there can be delays to mobilisation. Following appointment, surveys must only be undertaken when weather conditions are appropriate, so undertaking them at short notice can be challenging in a variable climate such as the UK. The identified timeframes are based on extensive professional experience of how long these activities take; for example, cost-benefit analysis of mitigation options requires information from equipment and mitigation suppliers and the timeframe for providing this is outside of the operator's control. However, these timeframes are the expected maximum and every effort will be made to expedite the process. It may be possible to complete the work quicker than specified when resources are available and weather conditions are appropriate It should also be noted that National Grid has a full time in-house noise team. As such, the response timescales,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				in terms of appointing an acoustician to investigate complaints, is not pertinent to National Grid.
			Norfolk County Council Norfolk County Council defers to South Norfolk District Council for matters regarding noise.	Please refer to the Applicant's response to DCO 1.A35 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
			South Norfolk District Council SNDC's Response to Article 48: 1, a, i – If the works is being undertaken in accordance with the conditions set down in a Section 60 or Section 61 then the no enforcement actions could be pursued as there would be a defence under the Control of Pollution Act 1974. This means that it is imperative that the conditions fully address this issue at this stage. 1, a, ii – This is not acceptable as the noise levels are modelled and do not accurately represent the real-world noise impact. As such a mechanism needs to be in place whereby the LA can have some authority over the development to ensure that additional mitigation measures can be required if the actual noise environment proves different from that modelled. As a general rule, a LA would not prosecute if the developer was actively working with them to reduce the noise impact that their activities are producing. 1, a, iii – This is covered by the Best Practical Means defence within the Control of Pollution Act 1974 - where as long as the developer is doing everything, they can, using the techniques which would cause the least impact then prosecution would not be sought. 1, a, iv – This is covered by the Best Practical Means defence within the Control of Pollution Act 1974 - where as long as the developer is doing everything, they can, using the techniques which would cause the least impact then prosecution would not be sought. 1, b, I & ii – These conditions have the propensity to cause a statutory nuisance which cannot be resolved. The proposed noise levels which will be in the CoCP will be based at least partially on modelled noise levels. As such some allowance should be given to allow for unforeseen circumstances. This is written to protect the operational phase of the project which will last for decades, as such the levels of adverse impact which would be experienced need to be capable of being controlled where they depart from the modelled impacts.	Despite the provisions of article 48, the contractor is required to employ the same standards of Best Practicable Means (BPM) that are required by the Control of Pollution Act 1974 by commitment NV01 of **7.2 Code of Construction Practice [Revision D]**. Contractors will be required to prepare detailed construction noise and vibration assessments based on their specific methodologies, determine specific mitigation measures, and update the Noise and Vibration Plan (NVMP) accordingly, via commitment NV05 of **7.2 Code of Construction Practice [Revision D]**. The NVMP will be shared with the local planning authorities. Provision for Section 61 applications is provided via commitment NV03 of **7.2 Code of Construction Practice [Revision D]**. As noted in the **3.2 Explanatory Memorandum [Revision D]**, Section 158 of the Planning Act 2008 confers statutory authority for the purpose of a statutory nuisance generally. Article 48 in **3.1 Draft Development Consent Order [Revision D]** is based on the model provisions and the approach to providing a defence to statutory nuisance is well precedented in made DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Order 2024. The provision, as drafted, is appropriate for inclusion in **3.1 Draft Development Consent Order [Revision D]** to ensure that nuisance claims are considered in the context that the effects of the Project, as one of Critical National Priority that is needed to facilitate Clean Power 2030, if **3.1 Draft Development Consent Order [Revision D]** is made, will have to been found to be acceptable on the terms of the Order and its Requirements.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			2 – This will lead the LAs to require significantly higher levels of noise mitigation at the outset than would normally be required due to their inability to require or enforce changes to the mitigation measures after the requirement has been discharged. 3 – This would not be needed as any S60 or S61 would be based on the CoCP and any other information which has been provided. 4 – This is attempting to make the development immune to being served with an abatement notice under the Environmental Protection Act. This is unacceptable, as the LA must have recourse to deal with statutory nuisance issues without impediment. The fundamental problem is the noise is only predicted; the conditions are not robust enough if the noise departs from the predictions and environmental nuisance could then occur with no ability to enforce or require mitigations.	
			Thurrock Council The Council Environmental Health section notes that the detailed design of the substation, including plant specification and layout, has not yet been finalised, which does introduce some uncertainty as to the precise operational noise impacts that may arise. Notwithstanding this, the Council acknowledges that the Applicant has undertaken an operational noise assessment based on reasonable assumptions. This assessment demonstrates that, with the incorporation of appropriate mitigation, it is feasible for operational noise levels from the Tilbury North Substation to be controlled such that the rating level does not exceed the representative background sound level, in accordance with BS 4142:2014+A1:2019. On this basis, the assessment indicates that significant adverse effects, and therefore the likelihood of statutory nuisance, would be unlikely if such levels are achieved in practice. The Council therefore considers that the submitted assessment provides confidence that a suitable design solution is achievable. However, as the detailed design is not yet fixed, it is important that the ability to achieve these outcomes is secured through the DCO. In this regard, the Council has considered the implications of Article 48, which provides a defence to proceedings in respect of statutory nuisance where operation is in accordance with the DCO and any approved details. As such, it is important to ensure that appropriate and enforceable controls are secured, as	This is noted. The Applicant will consider the inclusion of a suitable requirement and provide an update at Deadline 5.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			reliance on statutory nuisance powers may be limited where compliance with the DCO is demonstrated. To ensure that the outcomes indicated within the Environmental Statement are realised in practice, the Council considers that the following measures should be secured: • A Requirement for the submission and approval of a detailed operational noise assessment for the Tilbury North Substation prior to it being brought into operation (including a mechanism for assessing and mitigation low frequency noise). This assessment should be based on the final plant specification, layout, and operational characteristics. • The establishment of operational noise limits at identified noise-sensitive receptors, derived in accordance with BS 4142:2014+A1:2019 (or an agreed equivalent methodology), such that the rating level does not exceed the representative background sound level, unless otherwise agreed. • Confirmation that the assessment and compliance regime will take account of acoustic character corrections, including tonality where relevant. • A Requirement that the substation shall not be brought into operation until the Local Planning Authority has approved the detailed noise assessment and any necessary mitigation measures. • Provision for post-installation verification of noise levels, with a mechanism to secure further mitigation in the event that the approved limits are not achieved. Subject to the above measures being secured within the DCO, the Council is satisfied that sufficient certainty can be achieved, notwithstanding the absence of a finalised design.	
			Babergh and Mid Suffolk District Council Control and mitigation measures in respect of noise, vibration, dust and light can reduce the likelihood of a statutory nuisance however, they may not completely exclude the possibility of action being taken under the provisions of the Environmental Protection Act 1990. It is therefore not accepted that there should be a defence against proceedings in respect of statutory nuisance.	The Applicant notes the Council's comment, but refers to the justification provided in the **3.2 Explanatory Memorandum [Revision D]** and the Applicant's Response to EXQ1 DCO 1.A35 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
			Suffolk County Council Article 48(1)(a)(ii) applies to the construction and maintenance of the authorised development, and it is not clear to SCC that maintenance would be covered by "relevant code of construction practice or the relevant construction traffic management plan approved under	The Applicant is considering the Council's proposed revisions to the drafting and will update **3.1 Draft Development Consent Order [Revision D]** at a future deadline if considered appropriate.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Schedule 3." In the light of this, SCC considers the reference to "maintenance" should be deleted from the provision, which should be amended as follows – "relates to premises used by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised development and that the nuisance is attributable to the carrying out of the authorised development in accordance with the controls and measures relating to noise as described in the relevant code of construction practice or the relevant construction traffic management plan approved under Schedule 3 (Requirements) in accordance with the noise levels set out in an environmental permit relating to the operation of the authorised development; or" This amendment would make the provision consistent with the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) (i.e. article 45(1)(a)(ii)). Article 48(1)(b)(i) concerns a nuisance which is attributable to the use of the authorised development which is being used in accordance with the relevant code of construction practice approved under Schedule 3. It is not clear to SCC that use of the authorised development could be controlled by the relevant code of construction practice and so SCC considers this provision should be deleted. Article 48(2) should be amended as follows – "For the purposes of paragraph (1) above, in relation to the construction of the authorised development only, compliance with the controls and measures relating to noise described in the code of construction practice will be sufficient, but not necessary, to show that an alleged nuisance could not reasonably be avoided". The purpose of this amendment is to make explicit the fact the code of constriction practice is related to the construction of the authorised development. This amendment would make the provision consistent with the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) (i.e. article 45(2)).	
			Tendring District Council TDC shares the ExA's concerns regarding the potential for noise to impact the amenities of local residents especially in the absence of details for the detailed design of the EACN. The potential to cause harm though operational noise is accentuated by the presence of the EACN in combination with the substations serving North Falls and Five	The Applicant notes the Council's response.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Estuaries within the immediate vicinity EACN. which would be followed by the Tarchon interconnector, which is proposed in close proximity with the three other mentioned developments should it receive development consent. The local authorities are working with the Applicants for North Falls and Five Estuaries and more recently, the Applicant in respect of Norwich to Tilbury Project, to develop a joint noise protocol linked to a Requirement specifying an operational noise limit. The joint noise protocol sets out how the effects of operational noise will be managed and any complaints investigated. It is intended that a final protocol in accordance with this outline is prepared and submitted to the LPA prior to operation and for the document to be a certified plan within each application. A copy of the latest version of the 'Onshore substations operational noise and the outline noise complaints protocol' is attached as Appendix D.	
DCO 1.A42	All local authorities, highway authorities and statutory undertakers	**Article 58 (Application, disapplication and modification of legislative provisions)** The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.	**Essex County Council** *[supported/duplicated by Tendring District Council]* ECC has reviewed Schedule 17 of the dDCO. Where duplicated, ECC notes the public general legislation referenced in Schedule 17 reflects those in contained in the B2T DCO with the exception of Land Drainage Act and the Highways Act. ECC would suggest however, in the interests of clarity that for the Neighbourhood Planning Act 2017, the words "will not apply" is added to the end of the sentence. In respect of the Highways Act, ECC as the Highway Authority, is not content with disapplying and modifying restrictions on planting of trees, control of scaffolding on highways and controlling deposit of building materials and making of excavations in streets (as set out in Sections 141, 169 and 171 of the Highways Act 1980). The justification in the Explanatory Memorandum (Document 3.2) suggests that the provision appears in the Bramford to Twinstead DCO. ECC believes this is not accurate however because Bramford to Twinstead does not include any provisions from the Highways Act 1980. ECC would want to ensure that the types of works described in the Highways Act 1980 are controlled by the Local Highway Authority as they have the potential to impact on highway safety. In respect of the Land Drainage Act, ECC as LLFA, objects to the inclusion of these provisions at this stage. Section 23 of the Land Drainage Act (1991) requires applications to be made for proposals affecting existing ordinary watercourses. Though it is possible for it to be	The Applicant notes and is considering the Council's position and in the meantime is continuing to seek engagement on the protective provisions.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			covered in the Protected Provisions, ECC needs to be satisfied the interests of the LLFA are safeguarded. In addition, Section 24 of the Act prohibits the erection of obstructions or the making of alterations to existing structures which impedes the flow of ordinary watercourses while Section 25 of the Act requires that appropriate maintenance is carried out by riparian owners on ordinary watercourses. Failure of riparian owners to comply with Sections 24 or 25 can result in enforcement action if it is considered that a lack of maintenance or alteration to a watercourse poses a flood risk. AS a result, the LLFA consider there is a risk of harm to land drainage and surface water flooding. In respect of ecology and biodiversity matters, Schedule 17 as pertains to the Hedgerow Regulations 1997: Article 57 1. For the purposes of regulation 6(1) of the Hedgerow Regulations 1997(a), the removal of any hedgerow to which those regulations apply is permitted if it is required for the purposes set out in article 50 (felling or lopping) of this Order. ECC is considering this matter further and will respond in more detail at Deadline 4.	
			Chelmsford City Council Hedgerow regulations In principle CCC has no objections to the Hedgerow Regulations being disapplied, provided that alternative mechanisms exist to secure details of their removal, such as within the LEMP or other such document. This is based on our experience on Longfield Solar Farm, which required compliance with the Regulations DCO ref resulting in untimely and duplication of other Acts. CCC defers to the other relevant authorities with regard to the other matters.	Noted.
			Norfolk County Council The LLFA have taken legal advice on the proposed protective provisions to replace the disapplication of the Land Drainage Act 1991. The LLFA has a number of suggestions for suitable amendment to the draft protective provision for drainage and flood authorities. Our amendments our based on our previous experiences and are consistent with those applied to other NSIP schemes within Norfolk where a similar approach has been taken. These amendments provide clarification and consistency to our approach as an LLFA on the application of these provisions. NCC highways are looking to agree a protective provisions along with Suffolk County Council, Essex County Council and Thurrock Council.	The Applicant notes and is considering the Council's position and in the meantime is continuing to seek engagement on the protective provisions.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			South Norfolk District Council Not applicable to SNDC as at the present point in time this would fall under Norfolk County Council in their capacity as Local Highway Authority and Lead Local Flood Authority.	
			Thurrock Council Thurrock Council notes the proposed disapplication and modification of provisions of the Highways Act 1980 and Land Drainage Act 1991 under Article 58(1) and Schedule 17 of the draft DCO. Whilst the Council recognises the need to avoid duplication between statutory regimes and the DCO framework, it is not currently satisfied that sufficient justification has been provided for the breadth of the disapplications, nor that the implications for the Council's statutory functions as local highway authority and lead local flood authority have been fully addressed.	The Applicant notes and is considering the Council's position and in the meantime is continuing to seek engagement on the protective provisions.
			National Highways The Highways Act 1980 disapplication states: "Sections 141 (restriction on planting of trees etc. in or near carriageway), 169 (control of scaffolding on highways) and 171 (control of deposit of building materials and making of excavations in streets) of the 1980 Act will not apply to the extent such operations or works are required for the purposes of, or in connection with, the construction and maintenance of the authorised development." NH's Relevant Representation addressed this point and said "This article refers to Schedule 17 which seeks to exclude the provisions of the Highways Act 1980 in relation to the sections set out in Schedule 17. No explanation is provided in the Explanatory Memorandum seeking to justify the exclusion of the noted sections in the Highways Act 1980. In any event, NH objects to the disapplication of the Highways Act 1980 in this regard. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset".	The Applicant is engaging with National Highways on this point as part of its discussions on protective provisions.
			National Highways Lower Thames Crossing Project NH LTC has discussed the suitability of the disapplication of the Highways Act 1980 provisions with the National Highways spatial planning team and agrees with its objection to their disapplication. NH must have control over the operations being carried out on its network, including the LTC. This is critical from a safety perspective and to maintain the integrity of the asset.	Please refer to the Applicant's comments on National Highways' response above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Water Management Alliance Applicant's proposed disapplication of certain sections of LDA 1991, so long as they are replaced within the DCO by appropriate protective provisions for drainage authorities. This is to ensure IDBs are not prevented from carrying out their duties for effective land drainage. WMA has provided feedback to the Applicant on the draft Protective Provisions for drainage authorities but final agreement on these has not yet been reached.	The Applicant continues to engage with the relevant stakeholders on the protective provisions.
			Suffolk County Council In the first instance, SCC considers the Applicant should justify each instance of application, modification or exclusion of the statutory powers referred to in article 58 of, and Schedule 17 to, the **draft DCO [REP2-005]** and notes the relevant paragraphs of **the Explanatory Memorandum [REP2-007]** (see paragraphs 3.62 and 4.18) do not do this. (Instead, paragraph 3.62 states that similar provisions are included in the model provisions and other (named) orders)). Notwithstanding the above, regarding the Land Drainage Act 1991, SCC confirms that, at this time, the disapplication of these provisions is not agreed. Regarding the Highways Act 1980 – 1.1 Section 141: SCC does not agree with the disapplication of this provision because section 141 is an important tool in aiding road safety by preventing trees being planted in such a way that would (i) interfere with visibility / sight lines (ii) obstruct the highway corridor and (iii) interfere with highways assets. In the event of unlawful planting, section 141 provides a straightforward enforcement regime, requiring removal of the unlawfully planted trees within 21 days. 1.2 Section 169: SCC does not agree with the disapplication of this provision because it sets out a clear licensing and safety control regime for sca olding. In particular, SCC values the ability to impose conditions on any licence which ensures sca olding is erected safely. 1.3 Section 171: SCC does not agree with the disapplication of this provision because it provides a straightforward regime for controlling the temporary deposit of materials, rubbish, etc. or other things in the street. SCC would be concerned if any of these provisions were disapplied because doing so would risk compromising the safe operation of highways in SCC's area.	The Applicant notes and is considering the Council's position and in the meantime is continuing to seek engagement on the protective provisions.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Parliament would not have introduced these provisions if it did not consider they were necessary and SCC objects to their disapplication which is unjustified and largely unprecedented in DCOs. For example, paragraph 3.62 of the Explanatory Memorandum **[REP2-007]** (which concerns article 58 (application, disapplication and modification of legislative provisions)) refers to three precedents: National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI2024/958), A303 (Amesbury to Berwick Down) Development Consent Order 2023 (SI 2023/834), and Southampton to London Pipeline Development Consent Order 2020 (SI 2020/1099). None of these seeks to disapply any provision of the Highways Act 1980. **Babergh and Mid Suffolk District Council** Defer to the response from SCC	

8.2 Schedules

Table 8.2 Draft Development Consent Order - Schedules

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
DCO 1.S4	The applicant Environment Agency Anglian Water Any other relevant water company	**Schedule 3 (Requirements) – General** Anglian Water in its RR and D1 submission have indicated "…if non-domestic water supply is not agreed within the examination period… [it] would request the draft DCO includes a requirement for a water resources assessment to be submitted to the… [relevant] Planning Authority in consultation with the Environment Agency and relevant water company before construction progresses. The ExA requests i) the applicant provided its considered response to Anglian Waters request; and ii) the applicant, Anglian Water, the Environment Agency and any other relevant water company provides a form of wording for such a requirement, should the ExA consider the inclusion of such a requirement is necessary in the draft DCO.	**Environment Agency** Based on the evidence reviewed to date, we do not have any outstanding concerns that would necessitate the inclusion of an additional Water Resources–specific requirement in the DCO. This is because the key technical issues relevant to Water Resources have already been adequately addressed or remain in active discussion. In terms of dewatering management and discharge controls which would be our primary area of concern - this is appropriately captured in existing documentation. We are also pleased that the WFD assessment is current and incorporates our feedback. However, if the ExA determines that a new requirement is appropriate, we have no objection to its inclusion, provided that the EA's role is clearly limited to consultation, and that the requirement aligns with the scope of matters already reviewed by us. Any potential requirement will only need to consider water resource demands at the construction stage rather than operation or decommissioning. We suggest the wording used for the North Lincs Green Energy Park DCO would be suitable, but ensuring this is adapted to include the construction phase only.	The Applicant refers the Examining Authority to the Applicant's response to DCO 1.S4 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** where consideration was given to the addition of a requirement and reasons were given why it was not considered necessary.

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			Anglian Water In part ii) of this question, the ExA requests that the applicant, Anglian Water, the Environment Agency and any other relevant water company provide a form of wording for a water resources assessment requirement, should the ExA consider the inclusion of such a requirement is necessary in the draft DCO. Anglian Water and the Applicant have continued to liaise regarding the water resources required to support the delivery of the Norwich to Tilbury Project. Anglian Water can confirm that the Applicant has submitted information to us regarding the Water Resources Assessment, and this information is currently undergoing internal review for a decision regarding whether the temporary supply of non-domestic water through the construction period is "acceptable in principle". Anglian Water cannot guarantee a maximum daily demand request for non-domestic water until this is formally applied for by the Applicant, through submission of a Pre-Planning Application, and once agreed, this is only valid for 12 months. Proposed wording for a Water Resources Assessment requirement: Our suggested form of wording for such a requirement, is based on the requirement for a water resources assessment in the North Lincolnshire Green Energy Park (NLGEP) DCO, which was granted consent on 13 March 2025 – set out in Schedule 2 Requirements, Part 1, Paragraph 8. https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010116-001482-North Lincolnshire Green Energy Park - Development Consent Order.pdf Whilst the NLGEP DCO requirement for a Water Resources Assessment was to address the supply of water during the construction and operation of the Project, we consider that from the information provided in the Environmental Statement **[Chapter 12 – APP-221]** and supporting Outline Code of Construction Practice **[Commitment Ref W16 - REP2-014]**, the non-domestic water demands of the Norwich to Tilbury Project are only likely to exceed our current 20 m^3/day limit during the construction phase, and therefore a WRA would be required for us to determine whether temporary water supplies during this period would be feasible. For Nationally Significant Infrastructure Projects that require over 20 m^3/day of non-domestic water for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable	

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			growth. The suggested wording for requirement is set out below – we have applied the term 'relevant water company' in this requirement, as the Project order limits cross more than one water company supply area: Water Resources Assessment (1) No part of the Project may commence, save for the preliminary works, until a Water Resources Assessment is submitted to and agreed with the relevant water company following consultation with the Environment Agency on matters relating to their function and subsequently approved by the relevant planning authority. The Water Resources Assessment will include a scheme to deal with the supply of water during the construction of the authorised development including maximum daily demand, and water efficiency measures. (2) The scheme submitted and approved under sub-paragraph (1) must be in accordance with the environmental statement and for the construction water supply must be included in an update to the code of construction practice submitted pursuant to Requirement 4(1). (3) The scheme approved under sub-paragraph (1) must be implemented as approved throughout the construction of the Project unless agreed otherwise by the relevant planning authority following consultation with the Environment Agency and the relevant water company as necessary. (4) For the purposes of this Requirement (a) provider for the Norwich to Tilbury Project under the Water Industry Act 1991 and responsible for ensuring the cumulative impacts of development do not compromise the supply of water for domestic purposes; and (b) assessments, calculations, risk assessments and other documents that are reasonably necessary properly and sufficiently to describe the source and supply of water for construction.	
DCO 1.S5	The applicant All local authorities	**Schedule 3 – Requirement 1 (Interpretation) – Terms "discharging authority" and "start-up and close down activities"** a) "discharging authority": There are multiple examples throughout the draft DCO where terms such as 'discharging authority'; 'relevant planning authority' and 'relevant highways authority' appear to be used interchangeably. This could lead to confusion and would ask the applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion.	**Essex County Council** a) ECC is comfortable with the definitions for discharging authority, relevant planning authority & relevant highway authority and note they reflect the approach taken on Bramford to Twinstead. For certainty, given forthcoming local government reorganisation, the definitions of reluctant planning authority and relevant highway authority could be amended to add "any successor or successors in function", in case the relevant function is split across more than one successor. b) ECC would welcome clarity on this point and would refer to commentary raised across it's Relevant Representation submission (RR-1083) and LIR	Please refer to the Applicant's response to DCO 1.S5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. It is not necessary for the definition to include 'successors' (plural) because sections 6 and 21 of the Interpretation Act 1978 provide that, in any Act (which would include the Development Consent Order, if made) unless the contrary intention appears, '*words in the singular include the plural and words in the plural include the singular*'. Paragraph 6.1 of Advice Note 15[7] supports the Applicant's position not to re-state matters that are dealt with in the Interpretation Act 1978.

[7] Planning Inspectorate (2025) *Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders*

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		b) "start-up and close down activities": Reference is made to the safety checking of plant and machinery, under (g), whilst reference to 'safety checks' is listed in (c). Are they not the same thing? Clarify and amend as necessary.	(REP1-161) on the drafting of the "start up and close down activities" and concerns regarding the potential impacts on communities and the environment arising from the extensive construction hours proposed through the DCO. **Norfolk County Council** In principle, NCC is content with the use of different terms which sometimes relate to the same organisation because each of these terms has a separate meaning and there are instances where they are not interchangeable. This is a consequence of there being a mix of institutional arrangements across local government in the project area. • However, there are instances in the draft DCO where terms have been used in a way that does cause confusion precisely because these roles are not always consistent. For example, in paragraph 3 (fees) of schedule 4 (discharge of requirements), "relevant authority" and "relevant planning authority" are used apparently interchangeably, despite the fact that a third term, "discharging authority", would seem to be more suitable because its definition in schedule 3 matches the context in which "relevant authority" is used. • Requirement four as presently drafted includes a reference to 'other discharging authorit[ies] as may be appropriate to the relevant plan concerned'. Paragraph 1 (interpretation) of schedule 3 (requirements) defines "discharging authority" to mean the body responsible for giving any consent, agreement or approval required by a requirement in the order. In the case of requirement 4, this is no assistance because it becomes a circular reference. • NCC proposes an amendment to requirement four in our **LIR [REP1-173]** at pages 48 to 50 which would resolve this ambiguity by specifying that it is the relevant district planning authority who must approve all the management plans and specifying consultees by their roles. This part of the question does not appear to be relevant for NCC. **South Norfolk District Council** In light of Local Government Reorganisation, SNDC considers that the requirements should be worded such that the discharging authority is the Local Planning Authority due to the fact that whatever the makeup of the new unitary council's, there will always be a local	

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			planning authority which futureproofs the wording of the requirements. **Colchester City Council** In response to part a, CCC agree that this should be clearer. CCC request that where relevant planning authority is used it the DCO sets out if that is the upper or lower tier authority (or both pursuant) to the relevant work area/section applied for at the time. **Thurrock Council** The Council would request that draft DCO should clearly distinguish between 'discharging authority', 'relevant planning authority' and 'relevant highway authority', with each term defined separately and used consistently. **Braintree District Council** The Council respond using the same sub-numbering: a) The Council agree that confusion could be avoided. As the Council understands, the wording is used on the basis that information will be sent to one of highways/planning with a decision of approval/discharge of requirements coming from that body empowered to give it. Hence, in some cases, planning will be the discharging authority, and in others highways. The term "discharging authority" is defined at Schedule 3, paragraph 1 but this may benefit from an amendment to make clear that the "discharging authority" can include the relevant planning authority or the relevant highways authority. The effect of which will be, for example, simplified wording, for example: "Sch 3, 1.(3) Where any requirement requires the authorised development to be carried out in accordance or general accordance with matters including a plan, document, or details approved by the relevant planning authority or the relevant highway authority (a discharging authority), those matters are to be taken to include any amendments that may subsequently be approved in writing by the relevant discharging authority." and "(4) Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority a discharging authority, such approval or agreement may only be given where it has been demonstrated to the relevant highway authority or the relevant planning authority discharging authority that the	

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			subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement." b) This is for the Applicant to confirm. However, the Council considers that the words "and safety checking of plant and machinery" at (g) could be deleted.	
			Babergh and Mid Suffolk District Council Please refer to response to DCO 1.A10 above. It is critical for there to be consistency amongst the LPAs and LHAs in this respect. BMSDC suggest this matter is discussed between the LPA / LHAs and the applicant and further submissions made at a later deadline.	
			Suffolk County Council a) "discharging authority": in paragraph 14.43 of its **LIR [REP1-178]**, SCC summarised its concern with this term as follows – "Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(1) defines "discharging authority" as "the body responsible for giving any consent, agreement or approval required by a requirement included in this Order …". The definition is circular and unhelpful. Requirement 4 (construction management plans) provides for the involvement of the "other discharging authority" in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions and one of the six tests for conditions is precision. SCC consider the inclusion of "discharging authority" in requirement 4 creates imprecision and requests that the Applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named. A similar drafting approach has been followed in the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and that drafting has already caused confusion post consent. SCC is keen to avoid any confusion in respect of this Order". SCC considers the best way forward would be for the Applicant and host authorities to meet to discuss how the Applicant wants to make the term "discharging authority" work. That might be more fruitful than the parties responding to each other's submissions on this point. b) SCC will await the Applicant's response to part (b) of this question and may respond to that; however, it seems to SCC that the reference to "safety checks" in	

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			(c) is in the context of the site and, in (g), in relation to plant and machinery. **Tendring District Council** a) TDC is comfortable with the definitions for discharging authority, relevant planning authority & relevant highway authority and note they reflect the approach taken on Bramford to Twinstead. For certainty, given forthcoming local government reorganisation, the definitions of reluctant planning authority and relevant highway authority could be amended to add "any successor or successors in function", in case the relevant function is split across more than one successor. b) TDC would welcome clarity on this point and would refer to commentary raised across ECC's Relevant Representation submission **(RR-1083)** and LIR **(REP1-161)** on the drafting of the "start up and close down activities" and concerns regarding the potential impacts on communities and the environment arising from the extensive construction hours proposed through the DCO.	
DCO 1.S7 All local authorities	The applicant	Schedule 3 – Requirement 3 (stages of the authorised development) requirement 3(1) specifies "…written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out…" The ExA would ask all local authorities, as well as any relevant discharging authorities whether seven days is an adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority? In addition to the above, should requirement 3(5) refer to sub-paragraph (2) and/ or (3)?	**Essex County Council** The Richborough Connection Project offered 10 business days in respect of this requirement, however, ECC would recommend in line with the other requests through the DCO that potentially a more extensive period should be considered given the scale and complexity of the project in respect of requirement 3(1), where the operations may cover more than one administrative area. It is recommended that written notice should be approved in writing throughout part 3(1), but clarity should be considered as to the grounds which approval may not be given, and any dispute resolution matters should be addressed. Furthermore, it is recommended that part 3(2) should also be submitted for approval to the relevant authority. Written notice of commencement should be given prior to commencement. In respect to the latter part of the question, it is recommended that it should be '(2) and (3)'. **Chelmsford City Council** CCC consider that seven days in insufficient time. No reference is given to working days meaning that this time could be less accounting for weekends and bank holidays.	Please refer to the Applicant's response to DCO 1.S7 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

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			CCC agrees that requirement 3 (5) should refer to both sub paragraphs 2 and 3.	
			Brentwood Borough Council BBC does not consider that a seven-day written notice period is adequate and would be supportive of written notices being approved in writing subject to an adequate time period for fulfilling this and suitable mechanisms being established in advance (subject to agreement) to facilitate this requirement upon the local authority.	
			Norfolk County Council In NCC's view, the programme for the project is essentially a matter for the applicant. The purpose of requirement 3 is not that local authorities should exercise control over the timing of stages of the development or pre-commencement works (except to the extent that certain works may not take place until requirements have been fulfilled), instead requirement 3 serves to define and structure the programme of works so that other requirements can sensibly apply to "stages" rather than to the project as a whole.	
			South Norfolk District Council SNDC considers the 7-day notification requirement insufficient for effective oversight of pre-commencement operations. SNDC considers 10 working days to be more appropriate to enable the Council's internal and external communication processes. SNDC agrees that the drafting is unclear. Requirement 3(5) should be amended to correctly reference the relevant sub-paragraph(s) to avoid procedural ambiguity and ensure clarity for both NG and the discharging authorities.	
			Colchester City Council Seven days is not sufficient. 21 days would be acceptable, but 14 days would be a reasonable compromise.	
			Thurrock Council The Council re-iterates its comment in the LIR Appendix A page 6: "The Council also notes that seven days' notice is insufficient for meaningful review and there is no express mechanism preventing works from proceeding where concerns are raised within the notice period. The Council request that the seven-day notice period is extended or replaced with a prior approval mechanism."	

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			Braintree District Council The Council request that prior notice is not less than 10 days prior to commencement. The Council, as a relevant planning authority, would still reserve its right to take appropriate action in respect of any breach of Requirements and/or breach of planning control. In respect of requirement 3(5) BDC say that the words "further to sub paragraph (2) or (3)" can be deleted without causing prejudice to any party."	
			Babergh and Mid Suffolk District Council BMSDC have concerns regarding the adequate and appropriate compliance monitoring and reporting of the development and the implications this may have on enforcement for the LPA. As such, BMSDC suggest that the pre-commencement works notifications should be subject to approval by the relevant LPAs, to allow time for the documents with which those works must be in compliance with to be checked and confirmed, and for any other matters arising to be alerted to the applicant. 7 days is inadequate to allow this to happen and BMSDC suggest a period of 35 days, consistent with the request for time period for consideration of other submissions made pursuant to the DCO be imposed.	
			Tendring District Council The Richborough Connection Project offered 10 business days in respect of this requirement, however, TDC would recommend in line with the other requests through the DCO that potentially a more extensive period should be considered given the scale and complexity of the project in respect of requirement 3(1), where the operations may cover more than one administrative area. It is recommended that written notice should be approved in writing throughout part 3(1), but clarity should be considered as to the grounds which approval may not be given, and any dispute resolution matters should be addressed. Furthermore, it is recommended that part 3(2) should also be submitted for approval to the relevant authority. Written notice of commencement should be given prior to commencement. In respect to the latter part of the question, it is recommended that it should be '(2) and (3)'.	
			Suffolk County Council In paragraph 14.46 of its LIR **[REP1-178]**, SCC explained that requirement 3(1) (and the 7-day limit) is included in the equivalent requirement of the National Grid (Bramford	Please refer to the Applicant's response to DCO 1.S7 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

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			to Twinstead Reinforcement) Order 2024 (SI 2024/958) and that SCC's experience of dealing with pre commencement operations under that Order has shown the time period to be too short. One of the reasons 7 days is too short is because, by requirement 4(3) of the Bramford Order, "all pre-commencement operations must be carried out in accordance with the outline construction environmental management plan, the outline materials and waste management plan, the outline construction tra ic management plan, the outline landscape and ecological management plan and the outline public right of way management plan …". Seven days is not enough time for the relevant planning authority (or the relevant highway authority) to check whether the Applicant has done everything it must do under the relevant control document (let alone consult with another body). SCC considers a longer period is required and requests that the 7-day period be increased to 35 days. Regarding the cross-reference in requirement 3(5), SCC considers the current drafting (which cross-refers to sub-paragraph (2) or (3)) is correct.	The obligation in Requirement 3(1) is to notify the relevant planning authorities of the proposed programme of pre-commencement operations prior to those pre-commencement operations being carried out. The requirement does not include an obligation on the relevant planning authority to consult or approve the relevant programme and, therefore, the Applicant does not consider it necessary to extend the notice period. Compliance with the provisions of the Development Consent Order is a matter for the Applicant. The relevant planning authority is not required to verify compliance except where expressly provided for through approval, certification or agreement mechanisms secured by the Development Consent Order.
DCO 1.S8	The applicant All local authorities	**Schedule 3 – Requirement 5 (archaeology)** Braintree DC in its **LIR [REP1-148]** (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (**LIRs [REP1-153]**; **LIR [REP1-156]** and **[REP1-161]** respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph. Additionally, Norfolk CC in its **LIR [REP1-173]** recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint **LIR [REP1-178]** Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO. Historic England in its **WR [REP1-191]** has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England. All local authorities, as well as the applicant, are invited to comment on all of these proposed changes (amendment to article 23 and schedule 3, requiremen t 5 of the draft DCO and to H04 of the outline CoCP). In addition, the applicant is requested to provide, for discussion purposes, a new draft of requirement 5 that, as far as possible, takes into account all of these	**Essex County Council** **Chelmsford City Council** **Colchester City Council** ECC Place Services provides a response on behalf of ECC, as well as Chelmsford and Colchester City Councils (Braintree response provided separately) with regard to requested changes to Requirement 5(4) and an additional sub stage 5(5). Changes to 5(4) were requested to provide clarity between two stages of fieldwork. One stage requires the completion of the archaeological evaluation and geophysical survey which has been undertaken prior to and throughout the DCO application. This stage of works needs to be distinct from the programme of mitigation which would be devised following the completion of all archaeological and geoarchaeological evaluation which is covered by substage 5(1). A detailed WSI is requested for fieldwork carried out under 5(4) rather than carrying out the works under the Outline Archaeological Management Strategy (OAMS) and Outline written scheme of Investigation (OWSI). The current OAMS/OWSI (APP-328) is not yet agreed, in addition it does not provide details on the location of fieldwork required to complete the evaluation stage which would be required following consent to ensure agreement on the coverage and locations of evaluation areas.	Please refer to the Applicant's response to DCO 1.S8 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant adds that the updated **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]** (OAMS-OWSI) is being progressed with stakeholder input and will be circulated for comment ahead of the Deadline 5 submission. The AMS was discussed with stakeholders in the Archaeology Working Group meeting held on 6 May 2026, and timelines for additional comments were considered at that forum. In line with the request for timely feedback, the updated OAMS-OWSI is being shared directly with the appropriate authorities prior to Deadline 4 (to facilitate early review) and will again be available for comment as part of the Deadline 5 process. This approach aims to secure a deliverable, auditable mitigation framework within the Development Consent Order process, allowing sufficient time for any substantive feedback to be incorporated into the final Deadline 5 version.

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		requested changes and also is requested to provide a commentary on whether any of these proposed amendments sought by the various organisations would be incompatible with each other.	Section 5.3.42 in the OAMS and OWSI makes reference to the provision of a detailed WSI, "the scope and location of additional trial trenching will be described in a DWSI." The archaeological consultants for the Applicant have suggested that a revised version of the OAMS/OWSI may be available for deadline 4, this would then need to be reviewed by all authorities and Historic England. Final agreement on this control document cannot be assumed. The Applicant makes reference to the Bramford to Twinstead scheme as a basis of using the OAMS and OWSI for post consent pre commencement work which is not correct. The OWSI for Bramford to Twinstead was not agreed by the relevant authorities prior to gaining consent. The document was not considered sufficient to discharge any requirements. The consequences of not gaining agreement on the control document are now being realised through extensive negotiations for fieldwork elements and lengthy delays in discharge of requirements. It is likely this has caused a significant time and cost implications for the project. a) 5(5) An additional sub paragraph would enable full discharge of the requirement for each stage or sub-stage and provide more control over the timing and delivery of post excavation reports. As stated above the OAMS and OWSI are yet to be agreed and cannot be assumed to be agreed at consent. The addition of a separate requirement to produce and submit a post excavation assessment for agreement between all parties will allow the document to be live and reflect any changes that may have happened since consent which could continue over a timescale of years. This would facilitate the consideration of any changes that may occur with current research aims, objectives, outreach and publication which could not be fully realised in the control document. **Norfolk County Council** NCC agrees with the proposed revised condition wording suggested by Suffolk County Council. At present in Norfolk and Suffolk archaeological planning advice is provided at county level. We will await consultation on new draft requirement wording for the archaeological requirements, drafted by the applicant and taking into account the comments of all the local authorities. **Thurrock Council** The Council does not see any issue with the addition of these amendments to requirement 5. The Council would request that where the Council and Historic England work	

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			to agree a solution that protects the significance of the new discovery, the Council's environment team are able to meaningfully contribute to the agreement with the Applicant and its views are not superseded by Historic England's.	
			Braintree District Council Changes to Requirement 5(4) were requested to provide clarity between two stages of fieldwork. One stage requires the completion of the archaeological evaluation and geophysical survey which has been undertaken prior to and throughout the DCO application. This stage of works needs to be distinct from the programme of mitigation which would be devised following the completion of all archaeological and geoarchaeological evaluation which is covered by substage 5(1). A detailed WSI is requested for fieldwork carried out under Requirement 5(4) rather than carrying out the works under the Outline Archaeological Management Strategy (OAMS) and Outline written scheme of Investigation (OWSI). The current OAMS/OWSI (APP-328) is not yet agreed, in addition it does not provide details on the location of fieldwork required to complete the evaluation stage which would be required following consent to ensure agreement on the coverage and locations of evaluation areas. Section 5.3.42 in the OAMS and OWSI makes reference to the provision of a detailed WSI, "the scope and location of additional trial trenching will be described in a DWSI." The archaeological consultants for the Applicant have suggested that a revised version of the OAMS/OWSI may be available for deadline 4, this would then need to be reviewed by all authorities and Historic England. Final agreement on this control document cannot be assumed. The Applicant makes reference to the Bramford to Twinstead scheme as a basis of using the OAMS and OWSI for post consent pre commencement work which is not correct. The OWSI for Bramford to Twinstead was not agreed by the relevant authorities prior to gaining consent. The document was not considered sufficient to discharge any requirements. The consequences of not gaining agreement on the control document are now being realised through extensive negotiations for fieldwork elements and lengthy delays in discharge of requirements. It is likely this has caused a significant time and cost implications for the project. Requirement 5(5) - An additional sub paragraph would enable full discharge of the requirement for each stage or	

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			sub-stage and provide more control over the timing and delivery of post excavation reports. As stated above the OAMS and OWSI are yet to be agreed and cannot be assumed to be agreed at consent, the addition of a separate requirement to produce and submit a post excavation assessment for agreement between all parties will allow the document to be live and reflect any changes that may have happened since consent which could continue over a timescale of years. This would facilitate the consideration of any changes that may occur with current research aims, objectives, outreach and publication which could not be fully realised in the control document.	
			Babergh and Mid Suffolk District Council Defer to the response from SCC	Please refer to the Applicant's response to DCO 1.A28 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in relation to proposed amendments to Article 23 (removal of human remains). Please also refer to the Applicant's response to DCO 1.S8 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in which it sets out its position on the drafting revisions proposed by the local authorities on draft Requirement 5, in particular, the Applicant's concern regarding the proposed prohibition on any intrusive site preparation works. The Applicant adds that the updated **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]** (OAMS-OWSI) is being progressed with stakeholder input and will be circulated for comment ahead of the Deadline 5 submission. The AMS was discussed with stakeholders in the Archaeology Working Group meeting held on 6 May 2026, and timelines for additional comments were considered at that forum. In line with the request for timely feedback, the updated OAMS-OWSI is being shared directly with the appropriate authorities prior to Deadline 4 (to facilitate early review) and will again be available for comment as part of the Deadline 5 process. This approach aims to secure a deliverable, auditable mitigation framework within the Development Consent Order process, allowing sufficient time for any substantive feedback to be incorporated into the final Deadline 5 version.
			Suffolk County Council SCCAS requests that a joint meeting (consisting of all Local Authority Archaeological Advisors, Historic England and the Applicant) be arranged to agree the amendments to the DCO requirement wording. Article 23 (removal of human remains) SCCAS recommends that article 23 is amended as follows – "(17) Subject to subject to paragraph (17)A, section 25 of the Burial Act 1857 (offence of removal of body from burial grounds) does not apply to a removal carried out in accordance with this article. (17A) Subject to paragraph (17B), the disapplication mentioned in paragraph (17) does not apply to the removal of human remains where the undertaker is satisfied that the remains were interred more than 100 years ago. (17B) A removal to which paragraph (17A) applies must also be carried out in accordance with any issued burial license, any relevant detailed written scheme of investigation approved in accordance with requirement 5 (archaeology), and best practice documents". Requirement 5 (archaeology) Suffolk County Council Archaeological Service ("SCCAS") have grave concerns regarding the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation **[APP 328]** ("OAMS-OWSI") and the way the OAMS OWSI works with requirement 5. In this answer, we set out SCCAS' concerns with the OAMS OWSI (and the way it works with requirement 5) and provide revised drafting for requirement 5.	

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			Background to SCC's concerns with OAMS OWSI In November 2025, SCCAS provided extensive comments, including detailed suggested rewording of the OAMS-OWSI, to bring it up to an acceptable standard. These comments were then included in Annex A to SCC's **Joint LIR [REP1-178]**. As of Deadline 3, we have had no revised OAMS-OWSI supplied for review and have been informed by the applicant that it will not be available until the end of April 2026, which is after the issue specific hearings. In the light of this, SCC are unable to further comment on the OAMS-OWSI and stand by the comments and advice given in Annex A to the **Joint LIR [REP1-178]**. It is essential that the OAMS-OWSI is revised and brought into line, to closely reflect SCCAS' comments, in order to provide a clear process to deliver the necessary programme of archaeological works without causing unnecessary delay to the delivery of this critical infrastructure. It is also important that requirement 5 is robust and enforceable and includes a "tick box" approach to delivery of the archaeological project, which must include a programme of archaeological evaluation, mitigation, post excavation assessment reporting, updated project design, publication, archive deposition and public dissemination of results. SCCAS is concerned that the drafting of requirement 5 is substantively similar to requirement 6 (archaeology) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) where neither the Outline Written Scheme of Investigation (OWSI) nor the Archaeological Framework Strategy (AFS) was approved by Historic England or the Local Planning Authority Archaeological Advisors. Notwithstanding the fact the OWSI and AFS contradict one another, the OWSI fell well short of providing adequate protections for the historic environment or a coherent approach to further archaeological evaluation and archaeological mitigation. This approach has led to programme delays because of having to accommodate the necessary archaeological works, which were not clearly defined in the OWSI but were required by the DCO requirements. The mitigation strategy in the OWSI did not follow the well-tested approach of archaeological evaluation to inform and target a programme of archaeological mitigation. Had this approach been adopted in the OWSI it would have provided significant benefits to the construction programme as it has been proven over the past 40+ years to successfully deliver the necessary	

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			archaeological mitigation whilst facilitating timely release of land back to projects to allow development to commence where archaeological trial trenching shows low value to no archaeology present. This evaluation-led approach along with robust "tick box" requirement wording has been adopted successfully on other DCO projects, including the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853). SCCAS are keen to see such an approach followed here. In the light of SCCAS' negative experience with the Bramford control documents, it is essential those deposited with this application pass muster. Proposed drafting of requirement 5 SCC have considered the amended requirement 5 and the drafting proposed by the other local authorities and Historic England. Subject to some minor amendments, SCC considers the drafting proposed by the Essex local authorities is satisfactory. The text below is taken from the latest version of the draft DCO **[REP2-005]** and includes amendments consistent with those sought by the Essex authorities. An explanation for the amendments is set out below. 1. No stage of the authorised development may commence until either a preservation in situ management plan, or and a detailed written schemes of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the discharging authority. 2. Any detailed archaeological works must be carried out in accordance with the any approved detailed written scheme of investigation for that stage. 3. Each detailed written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include— – an assessment of significance and research questions; – the programme and methodology of site investigation and reporting;	

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- the programme for post-investigation assessment;
- proposals for providing for the analysis of site investigation and recording;
- proposals for providing archive deposition of the analysis and records of the site investigation;
- nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and
- an implementation timetable.

4. Intrusive preparation works must not take place until an archaeological or geoarchaeological detailed written scheme of investigation, produced in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the discharging authority. The archaeological or geoarchaeological detailed written scheme of investigation referred to in this sub-paragraph must be implemented as approved.
5. Unless otherwise agreed with the discharging authority –
   - no later than one year following the completion of the fieldwork specified in each detailed written scheme of investigation, a site-specific post excavation assessment (PXA) for each site must be completed in accordance with the detailed written scheme of investigation and submitted to the discharging authority for approval.
   - no later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design (UPD) for all applicable sites, must be submitted to the discharging authority for approval. The UPD must be in general accordance with the detailed written scheme(s) of investigation for each stage and the outline archaeological mitigation strategy and outline written scheme of investigation and include details of the scope of post-excavation analysis, publication and archiving and have regard to the site-specific research agendas set out in the detailed written schemes of investigation.
   - post-excavation analysis and publication must be carried out in accordance with the approved UPD and provision made for the full archive to be submitted to the appropriate museum.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			6. In this requirement – – where any document is to be approved by a discharging authority, it must be approved by that authority in consultation with Historic England, – "commence" includes pre commencement operations, – "outline archaeological mitigation strategy and outline written scheme of investigation" means that document as amended by Annex A to Suffolk County Council's **Local Impact Report [REP1-178]**, – in Suffolk, the reference in sub paragraph (5)(c) to "the appropriate museum" means the Suffolk County Council Archaeological Archive, which is located in Bury St Edmunds, and – in Suffolk, any reference in this requirement to "discharging authority" means Suffolk County Council. Justification for amendments In paragraph (1) "either … or" has been replaced with "and" because SCCAS would expect there to be intrusive archaeological investigation at every stage, not just preservation in situ. It is highly unlikely that preservation in situ would be appropriate on a scheme of this scale. Moreover, the areas the stages cover are of considerable size and there will need to be different approaches to the archaeology along those stages. In paragraph (2), "the" has been replaced with "any" because "the" implies a single approved scheme; in reality, there could be more than one. Subject to minor changes, paragraphs (4) and (5) are consistent with the drafting proposed by the Essex authorities. Regarding sub-paragraph (6)(a): amended requirement 5 requires several approvals by the relevant discharging authority. To make the drafting as succinct as possible, sub-paragraph (a) has been included to obviate the need to say "in consultation with Historic England" after each reference to "approved by the relevant discharging authority". Regarding sub-paragraph (6)(b): as currently drafted, requirement 5(4) of the **draft DCO [REP2-005]** requires pre-commencement operations to be "carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant discharging authority in consultation with Historic England". The outline documents are not fit for this purpose because	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			they do not define what or where the pre-commencement operations are. Owing to this, the pre commencement operations need to be subject to the approved control documents and this amendment has that effect. Regarding sub-paragraph (6)(c), as mentioned above, as currently drafted, the outline archaeological mitigation strategy and outline written scheme of investigation is not fit for purpose. SCC has suggested amendments to that document to make it fit for purpose. Until such time as a satisfactory outline archaeological mitigation strategy and outline written scheme of investigation is produced, SCC's version of that document should be referred to in the requirement. Sub-paragraph (6)(d) clarifies where the full archaeological archive must be deposited. Sub-paragraph (6)(e) clarifies SCC is the discharging authority for Suffolk. This is consistent with the amendment sought by SCC (and Mid Suffolk and Babergh Councils) in their **Joint LIR [REP1-178]** (paragraph 7.78). In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedented. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters. Similar clarification ought to be provided for Essex and Norfolk.	
DCO 1.S11	Braintree DC	**Schedule 3 – Requirement 8 (Retention and removal of trees, woodland and hedgerows) - matters arising from the implementation of the Bramford to Twinstead DCO** In your **RR [RR-0383]** you state that the Bramford to Twinstead DCO wording has caused difficulties. Provide examples of such difficulties you have encountered and provide your preferred wording for R8 of the draft DCO in terms of the need for due diligence.	**Braintree District Council** As outlined in the Council's Relevant Representations and Local Impact Report (REP1-148), the Council has experienced difficulties with the Requirement 8 wording used in the Bramford to Twinstead (B2T) DCO. Under B2T, the Requirement primarily secured a tree removal and retention plan, with key supporting information deferred to later stages. In practice, this approach did not provide sufficient information at discharge stage to enable a robust assessment of arboricultural impacts. The difficulties encountered included: • Insufficient evidence to justify tree removals, including Category A and B trees. • Limited ability to demonstrate avoidance or minimisation of impacts through design. • Uncertainty regarding the feasibility of proposed tree retention, particularly where works affected Root Protection Areas (RPAs). • A reactive discharge process, with repeated requests for further information and associated delays.	The Applicant acknowledges the concerns raised by Braintree District Council regarding its experience under the Bramford to Twinstead (B2T) Development Consent Order (DCO); however, it is considered that the Council's suggested amendments would introduce a level of prescription at the Requirement stage that is neither necessary nor proportionate for a Nationally Significant Infrastructure Project. The current approach to Requirement 8 is consistent with other DCOs and is intended to maintain flexibility across a large, linear project where detailed design and construction methodologies will necessarily evolve. Securing Arboricultural Method Statements at the initial approval stage for each phase of development would risk pre-empting detailed engineering solutions, constrain the ability to respond to site-specific constraints as they arise, and potentially lead to abortive work where design refinement subsequently changes the extent or nature of impacts. The Applicant considers that the submission and approval of Tree Retention and Removal Plans at the initial stage, supported by the Environmental Statement

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Challenges in securing proportionate and appropriate mitigation/compensation, particularly where insufficient early information affected the robustness of LEMP-related provisions. Based on this experience, the Council considers that if Requirement 8 for this DCO follows the B2T model and relies predominantly on removal/retention plans, similar issues may arise. This is of particular relevance to sensitive receptors such as ancient woodland, where early clarity on impacts and mitigation is essential. To provide the necessary due diligence and to ensure an effective discharge process, Requirement 8 should secure at the initial approval stage: • An Arboricultural Impact Assessment, • An outline Arboricultural Method Statement (AMS) sufficient to demonstrate the feasibility of working near retained trees and within RPAs, and • A Tree Protection Plan. This should be accompanied by a mechanism requiring detailed, site-specific AMS information to be submitted and approved prior to any construction works that may affect trees. Owing to the above, the Council suggest that Requirement 8 is updated similar to the below: *8.—(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, the following arboricultural information has been submitted to and approved by the relevant planning authority— (a) a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed; (b) an Arboricultural Impact Assessment for that stage; (c) an outline Arboricultural Method Statement demonstrating in principle how works in proximity to retained trees, including within Root Protection Areas, would be undertaken without unacceptable harm; and (d) a Tree Protection Plan.* *(2) The plan and supporting documents submitted under sub-paragraph (1) must include details of— (a) the location, species, category, dimensions and condition of the trees, groups of trees, woodlands and hedgerows to be removed and/or retained; (b) justification for proposed tree removals; and (c) the measures proposed to avoid or minimise impacts on retained trees and hedgerows.* *(3) The submissions under sub-paragraph (1) must be in accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4)*	and appendices, provides sufficient certainty as to the scale and acceptability of effects, including in relation to sensitive receptors such as ancient woodland and veteran trees. The subsequent requirement for detailed, stage-specific Arboricultural Method Statements prior to works affecting trees is considered the most appropriate point at which feasibility, Root Protection Area incursions, and site-specific mitigation can be robustly assessed. This staged approach reflects the mitigation hierarchy, ensures construction practicability can be demonstrated with up-to-date information, and avoids unnecessary delay to the authorised development while still providing the relevant planning authority with effective control prior to works commencing. It is also noted that commitments in the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** and **7.2 Outline Code of Construction Practice [Revision D]** collectively provide a comprehensive framework for tree protection, impact minimisation and mitigation.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			and the trees and hedgerows to be removed or managed plans. *(4) No works affecting trees, groups of trees, woodlands, hedgerows or any Root Protection Area may commence until a detailed, stage-specific Arboricultural Method Statement consistent with the outline Arboricultural Method Statement approved under sub-paragraph (1)(c) has been submitted to and approved by the relevant planning authority.* *(5) The authorised development for that stage must be carried out in accordance with the plans and documents approved under sub-paragraphs (1) and (4), unless otherwise agreed by the relevant planning authority.* The proposed amendments to Requirement 8 are intended to ensure that sufficient arboricultural information is secured at the appropriate stage to allow a robust assessment of impacts and to avoid the practical difficulties experienced under the Bramford to Twinstead DCO. By requiring submission of an Arboricultural Impact Assessment, an outline Arboricultural Method Statement, and a Tree Protection Plan at the initial approval stage, the revised wording provides early certainty that impacts have been properly assessed, and that proposed tree retention is feasible in construction terms. The inclusion of a mechanism for stage-specific, detailed Arboricultural Method Statements prior to works affecting trees ensures that construction methodologies can evolve without compromising tree protection or the ability of the relevant planning authority to assess impacts effectively. This approach balances flexibility with due diligence and supports the delivery of proportionate and appropriate mitigation and compensation, particularly in relation to sensitive receptors such as ancient woodland.	
DCO 1.S19	The applicant All local authorities All discharging authorities	**Schedule 4 – (Discharge of requirements) - 1** The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document 'Building our nuclear nation: government response to the Nuclear Regulatory Review 2025'. The ExA draws attention to: i) it is seeking to accelerate "…efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole…"; and ii) its response to Recommendation 30, where it indicates this includes "…establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects."	**Chelmsford City Council** a) CCC is aware of similar NSIP consenting schemes being undertaken by Government departments. Irrespective of whom has responsibility for discharging the requirement, CCC would expect to be consulted at pre-application stage on the details of the requirement, to allow for comments to be provided on the acceptability of the submission documents, to avoid on-going additional information requests once a requirement is in for discharge. A PPA and resourcing would be required to undertake requirement discharge. CCC would expect the Applicant to enter into individual discussions to develop a proposal for the	The Applicant notes the responses from host authorities. The Applicant's position was set out in response to question DCO 1.S19 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and this was further discussed in Issue Specific Hearing 2 where the Applicant confirmed that it will continue to keep the matter under review as the government's proposals evolve – refer to **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]**. The Applicant also confirmed that it will continue discussions with the host authorities on this issue and provide an update at Deadline 5.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		In the light of the above document and a clear statements from the government regarding its intention in related to post-consent discharge, the applicant and discharging authorities are asked to: a) Provide comments on the above publication in respect of post-consent discharge functions. b) Consider if the current drafting of schedule 4 in the **draft DCO [APP-056]** is an appropriate approach to the post-consent discharge of requirements, or whether schedule 4 of the **draft DCO [APP-056]** should take a similar approach to that set out in schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025?	discharge of requirements such that they complement CCC's current processes and timeframes. Should this be unacceptable to the Applicant, then there may be merit in exploring how the proposal operated by DESNEZ would operate. b) CCC notes that the Lower Thames Crossing DCO has been given an eight-week period for discharging requirements, which is considered acceptable. The process also enables extension of the timeframe where further information is required (21 (1) (b). There is also time (3) to request additional time for consultation responses. In respect of requests for further information a timeframe of 28 days is given for consultees to respond (23 (1 (b) refers) CCC considers the extended timeframes to be helpful and allow full consideration of the requirements. The current proposed discharge process is given 28 days which CCC has previously stated to be unacceptable. Part two (2) in unworkable. The requirement states that (2) If the relevant authority considers further information is necessary and the Requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 days of receipt of the application, notify the undertaker in writing specifying the further information required The process fails to include time to register and consider the application, request consultation responses, receive consultation response and review and consider such information. Moreover, the time specified is not working days and thus could include weekends and bank holidays. Should this approach be applied over the Easter bank holiday weekend, there would be only one day to undertake this process. This is unreasonable. Please see comments to DCO 1.A2 Overall CCC prefers the approach to discharge the requirements as set out in the Lower Thames Crossing. **Norfolk County Council** a) NCC is aware of the nuclear regulatory review and the government's acceptance of its recommendations. NCC notes that no details or guidance has yet been published on how the approach to post-consent discharges will be implemented. NCC also notes that	

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			there is no suggestion that this approach is to be mandatory. That is to say, an applicant might prefer to name another appropriate body or person as the discharging authority for requirements. Energy NSIPs are different from road network NSIPs in that the vast majority of road network NSIPs are promoted by a single government agency (National Highways) which has a longstanding arrangement to use the secretary of state for transport as their discharging authority. The energy sector has a more diverse set of applicants who may wish to do things differently to suit the circumstances of their own project. b) NCC does not think that the draft DCO should be redrafted to take a similar approach to that in The A122 (Lower Thames Crossing) Development Consent Order 2025 ("the LTC DCO"). As far as NCC is aware, the Department for Energy Security and Net Zero has not yet set up such a unit within the Infrastructure Planning Delivery team. NCC also understands that the applicant intends to engage with discharging authorities on discharge of requirement applications in advance of consent being granted. In NCC's view, it would be better for programme certainty for the applicant to be able to continue to engage with the bodies which they are currently expecting to be responsible for discharging requirements. Notwithstanding the overall arrangements, NCC does agree with some elements of the approach to discharge of requirements taken for the LTC DCO. For example, in the LTC DCO, the maximum period for discharge is 8 weeks as opposed to 28 days in the Norwich to Tilbury draft DCO. NCC also considers that there is merit in the requirement at paragraph 24 of Schedule 2 in the LTC DCO for the applicant to maintain a register of requirements.	
			South Norfolk District Council SNDC notes that National Grid met jointly with all Local Planning Authorities on 27 March 2026 to discuss the proposed approach to the discharge of Requirements. At this stage, insufficient information has been provided on how the discharge process will operate in practice, including expected responsibilities, sequencing, and the interface with the future DESNZ team. In the absence of this necessary detail, the SNDC is not yet in a position to make a substantive or definitive comment on the drafting or operation of the relevant DCO provisions.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			However, the SNDC understands from National Grid that the intention is to commence work on discharging Requirements immediately post-consent, and that this may occur before the DESNZ discharging authority arrangements are formally established. Clarity on governance, communication routes, timescales, and decision-making responsibilities will therefore be essential. SNDC looks forward to receiving further information from National Grid as discussed and will provide a full and informed response once that material is available. At present, the proposals are unacceptable because they are premature for this project, given that the Government has not yet even indicated whether they will accept the recommendations made.	
			Thurrock Council a) The Council acknowledges the government's intention, as set out in the Nuclear Regulatory Review 2025, to accelerate post-consent decision-making, and notes that Recommendation 30 confirms that DESNZ will "consolidate and deliver post-consent discharge functions in consultation with Local Authority Planning Departments." 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. This is important given the scale of the proposed project and its potential for significant environmental effects and local impacts. Therefore, the Council considers it essential that it continues to play a meaningful role in post-consent discharge if the DCO is granted. b) The Council has considered the draft schedule 4 of the draft DCO and is concerned that it seems to afford the Applicant greater control over the post-consent process in comparison to the approach adopted in the Lower Thames Crossing (LTC) DCO. There are several differences the Council notes between the two. First, the period where the Secretary of State must give notice to the undertaker of a decision on an application for consent, agreement or approval required by a requirement in the DCO is 28 days compared to the 8-week period in the LTC DCO. This would reduce the time available for effective consideration of submissions. Second, the Council notes the absence in the draft DCO of a detailed consultation process like that in	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			paragraph 23 of the LTC DCO, which sets out a clear consultation process, a minimum consultation period of 28 days and an obligation on the undertaker to give due consideration to representations received about the proposed application. Additionally, there is no register of requirements, which enables the public to electronically inspect requirements in the DCO and their status. This provides more transparency and accountability in the post-consent process which is important for a project of this scale. Therefore, the Council requests the Applicant to explain why the proposed project has a more limited consultation and oversight framework and to consider amending the draft DCO to be more inclusive in the post-consent discharge of requirements.	
			Braintree District Council The Council respond using the same sub-numbering: a) The Council note the 2025 Review. It is also noted that post consent discharge functions will be "in consultation with Local Authority Planning Departments" with schemes of this sort identified as being within the initial focus. BDC would work with any new unit of DESNZ's Infrastructure Planning Delivery ('IDP') team. BDC would expect a PPA to be agreed to cover Officer and consultee time to review any submitted information. b) Whilst a matter for the ExA, if post-consent discharge functions are to be dealt with by a new unit within the IPD, then the drafting within Schedule 2 of the Lower Thames Crossing DCO is preferred."	
			Dept for Energy Security & Net Zero The Department has reviewed the Examining Authority's written questions and requests for information issued on 20 March 2026, and notes in particular question DCO 1.S19. In "Building our nuclear nation: government response to the Nuclear Regulatory Review 2025", the government committed to the establishment in DESNZ of a new unit within its Infrastructure Planning Delivery team to consolidate and deliver post-consent discharge functions in consultation with Local Authority Planning Departments, which will initially be focussed on nuclear power and electricity networks projects. We can confirm that work on this unit has been initiated. We intend to publish an operational framework and	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			accompanying guidance and will set out further details of our schedule in due course.	
			Babergh and Mid Suffolk District Council a) post-consent discharge functions There is currently limited information relating to the proposed new unit will and what role local authorities will play in the discharging process. Without such clarity BMSDC have concerns that the transfer to the new unit and process may result in delays and increased risk of error. BMSDC suggest that the existing DCO wording is retained, and that the Secretary of State consider, prior to issuing a consent, to make any modifications to the process that they see fit in light of the emerging role, scope, and capacity of the new unit. The Council anticipates that it is reasonable to expect a period of engagement between local authorities, applicants, and DESNZ to take place prior to the formation of the new unit. b) appropriate approach to the post-consent discharge of requirements BMSDC notes the construction of The A122 (Lower Thames Crossing) Development Consent Order 2025 in respect of the SoS' role in determining discharge of requirement applications and the provisions for consultations with specified bodies by the undertaker. BMSDC considers the current drafting of the dDCO to be consistent with established practice for NSIP developments and, noting the response to a) above, reflects LPAs' current expectations for carrying out discharge of requirements functions.	
			Suffolk County Council a) post-consent discharge functions It is not clear how the proposed unit will operate. However, it appears that the Department for Transport National Case Unit may be the preferred model, and this could be established within the Department for Energy Security and Net Zero ("DESNZ") Infrastructure Planning Delivery Team. Given the number of electricity connection projects and the need for such schemes to discharge the same requirement multiple times, it appears that this may pose a significant challenge for the new unit, in terms of scale, pace, and the availability of expertise. The Council suggests therefore that the existing approach should be maintained in the DCO wording, and that this should be a matter for the Secretary of	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			State to use their discretion, prior to issuing a consent, to make any modifications to the process that they see fit in light of the emerging role, scope, and capacity of the new unit. The Council anticipates that it is reasonable to expect a period of engagement between local authorities, transmission operators, and DESNZ to take place prior to the formation of the new unit. Further, DESNZ may issue guidance on this matter prior to the close of the examination which may change the Council's position. b) appropriate approach to the post-consent discharge of requirements By section 120(2)(b) of the Planning Act 2008, the requirements imposed by a DCO may include "requirements to obtain the approval of the Secretary of State or any other person …". By Schedule 4 (discharge of requirements) applications made under Requirements are made to the "relevant authority". Since the "relevant authority" is any other person, the drafting is clearly an appropriate approach to the post-consent discharge of requirements. It will be remembered that the Lower Thames Crossing DCO was promoted by National Highways and that applications made under requirements in National Highways DCOs are discharged by the Secretary of State. While (per section 120(2)(b) of the Planning Act) it would be lawful for the Secretary of State to determine applications, SCC considers the usual practice for the determination of applications should apply to the instant application, with the "relevant authority" being responsible.	
			Tendring District Council and Essex County Council a) The 2025 Review is noted. It is also noted that post-consent discharge functions will be "in consultation with Local Authority Planning Departments" with schemes of this sort identified as being within the initial focus. The County authority would work with any new unit of DESNZ's Infrastructure Planning Delivery ('IDP') team. b) Whilst a matter for the ExA, if post-consent discharge functions are to be dealt with by a new unit within the IPD, then the drafting within Schedule 2 of the Lower Thames Crossing DCO is preferred.	

9. Historic environment

Table 9.1 Historic environment

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
HE 1.1	The applicant	NPS EN-1 (2023) and CNP Paragraphs 11.2.8-11.2.11 of ES Chapter 11, **Historic Environment [APP-208]** sets out and quotes government policy on energy infrastructure and CNP. The applicant is asked to set out: a) How such policy is applicable in this case to a proposal which would cause acknowledged harm to numerous heritage assets. b) How the mitigation hierarchy has been met and complied with in the case of harm to heritage assets.	**Ardleigh Parish Council and Little Bromley Parish Council** *[Note: this is identified as applying to questions HE1.1 and HE1.48; it is only included in this document once in relation to HE1.1 for ease of reference]* Whilst the Parish Councils cannot profess to be in any way expert in respect of heritage, this methodology used by the Applicant to assess Heritage Assets (6.11.A2) has been questioned by a number of interested parties. In respect of how Heritage Assets are assessed, the Parish Councils consider that the approach taken by the Applicant is as follows: a) A value of "High", "Medium", or "Low" is attributed to an Asset. b) A description of the "Construction Impact" is given which usually acknowledges that the wider rural setting would be altered by pylons, the construction work, and in some cases acknowledge that the asset could be lost or damaged. The Applicant then gives a magnitude of impact score and allocate a high, medium or low adverse impact score, usually lower than the asset value c) This is accompanied by a "standard mitigation" statement which nearly always states that Standard Construction Mitigation would be adopted. The Applicant then claims that changes to the setting would be temporary. The problems with this approach are: d) The Value score is subjective. In the case of listed buildings they have already been awarded status by the grading system their value should not be overridden by a subjective assessment. e) The standard approach to the Construction Impact is to acknowledge that there will be changes to the wider rural setting by the construction of pylons or compounds and there may be noise and disruption to the asset. f) The approach to mitigation is odd, as the statement nearly always claims that: *"Standard construction mitigation would be adopted as detailed in the Outline CoCP (document reference*	The assessment methodology is in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and, regarding assessment of value and impact, has been agreed with Historic England (5.9.14 Draft Statement of Common Ground - Historic England [REP3-022]) and the historic environment advisors to the Local Planning Authorities. The assessment presented in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and referenced in this comment, builds on the heritage asset and setting descriptions in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The construction phase assessment considers the potential impacts of the construction activities involved in building the Project, which are temporary in nature. The operation (and maintenance) phase assessment considered the potential impacts of the presence of the overhead line, including pylons, substations and other above ground infrastructure. The Applicant has provided detailed responses to HE 1.1 and HE 1.48 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			7.2). Changes to the setting would be temporary and would be removed once the construction phase is completed. 13 No additional mitigation measures are proposed during the construction phase as any measures designed to lessen the visual impact of the Project would be of a scale that would visually adversely alter the setting of the asset" g) This suggests that once the construction phase is completed the pylons will be removed and everything will go back to what it was, which clearly is not the case. It therefore seems that the Applicant considers that suddenly the pylons that were affecting the wider rural setting during construction, will no longer do so post construction. The statement quoted above also clearly accepts that the proposed development itself would adversely alter the setting of each heritage asset discussed. h) The significance of effect concludes in most cases that the mitigation compensates for any adverse effect. *"The value of the church is high, and the magnitude of impact prior to mitigation is considered to be low adverse. The implementation of standard construction mitigation would benefit the historic environment but would not reduce the change in setting enough to reduce the impact. Therefore, there is likely to be a temporary minor adverse significance of effect on the asset (not significant)."* There are 72 listed buildings in Ardleigh, one of which is GII* listed (St Mary's Church. Together with these 72 buildings, there is also a Conservation Area and a Scheduled Monument as well as many non-designated heritage assets. The Applicant treats each of these with equal contempt by the approach to assessment that has been taken. A high-level and broad-brush approach has been applied to all, seemingly reaching similar conclusions (in the Applicant's favour) in each case, regardless of the actual significance of the heritage asset being assessed There are many similar examples in Little Bromley.	
HE 1.4	The applicant Historic England	**ES Chapter 11, Historic Environment – embedded mitigation** Paragraph 11.6.4 of **Chapter 11 [APP-208]** states that lower height pylons are proposed for the section of OHL that passes between Great Waltham and Little Waltham conservation areas to reduce visibility of the alignment from various heritage assets. To the applicant:	**Chelmsford City Council** CCC have previously responded to this matter. See CCC LIR REP1-153 especially paragraphs 8.56 – 8.59.	The Applicant has responded to Chelmsford City Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		• What is the cost or technical difference between the lower height and 'standard' height pylons? • Why are the lower height pylons not chosen for a more extensive part of the route, or indeed all of it? • Has undergrounding or T-pylons been considered for the same stretch of route – and if not, then why not? Various relevant representations raise concerns over the use of the lower height pylons considering that their more squat nature would have more of an impact locally. Respond to such concerns. The detail in table 3.16 and 3.17 of **ES Chapter 3 [APP-127]** is noted in respect to the above queries. To Historic England Provide your views on the effectiveness (or otherwise) of the lower height pylons for this area and any other comments you may wish to make on this matter.		
HE 1.6	The applicant	**Harm to heritage assets** The proposed development is assessed to cause 'negligible' harm to various heritage assets along the route. Confirm if this equates to less than substantial harm in line with NPS EN-1 (2023) paragraph 5.9.30.	**Holton St Mary Parish Council** *[*note: this submission is stated by HSM PC to also relate to HE 1.8, HE 1.9, HE 1.11, and HE1.12 but is not repeated for ease of reference]*. We commend the Examiner for raising these important questions. HSM has six Grade II Listed properties nearby or adjacent to the haul road and two on the East of the North slip-road to the A12 at Junction 31. We request transparent information about how the term '"negligible'" was arrived at considering the closeness of these assets to the works, not just during the construction period but thereafter, and including the possible effects on their structural integrity, and ambience and setting. Further, mitigation or avoidance of these effects appears not to have been presented. The listed buildings are Dewlands, Pintins, Tiffins, Lark Hall, Holton Place and Mayfields near or adjacent to the haul road,. Moreover, unlisted Laits barn will be adversely affected by its proximity to the haul road. Four Sisters farmhouse and its separate barn on the North B1070 slip-road to the 12 are Grade II listed. Pintins and Tiffins will be affected by the proposed drainage works on Sandpits Llane. HSM requests information from the Applicant as to why the activities along the haul road near the nearby properties will not cause structural damage including to the foundations of these buildings.	The Applicant responded to this question (HE 1.6) and provided a detailed response regarding potential for vibration impacts to listed buildings in response to HE 1.11 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Temporary construction phase effects as a result of change within their settings were assessed for Dewlands Farmhouse (1036963/1036986) and were concluded to be minor adverse, for Pintins (1036984) to be moderate adverse, for Tiffins (1036985) to be moderate adverse, for Lark Hall (1036983) to be moderate adverse, for Holton Place (1036982) to be minor adverse, for Four Sisters Farmhouse (1351597) to be minor adverse and for Barn Approximately 20 Meters North West of Four Sisters Farmhouse (1198496) to be minor adverse (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**). Mayfields (1036981) was included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, in which it was concluded the setting did not extend to the Order Limits. Laits Barn was considered as part of the group and setting of Lark Hall (1036983). The assessment of these listed buildings does not use the term 'negligible'.
HE 1.9	All local authorities	Applicant's assessments: Unless you have provided agreement or otherwise in your LIR, for your area of jurisdiction please state whether you are in agreement with the applicant's assessment of:	**Essex County Council** a) ECC is in agreement with the scoping of heritage assets based on the methodology provided. b) ECC is in agreement with the level of harm, on the assumption that this is based upon the route line	The Applicant has provided a detailed response to HE 1.10 which explains the approach to assessment of Limits of Deviation in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		a) Designated and Non-Designated Heritage Assets to be scoped out of further assessment as set out in **ES Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. b) The levels of harm assessed, for the construction phase and the operation and maintenance phase, as described in ES Appendix 11.7 Assessment of Harm to Designated Heritage Assets [APP-215]. c) The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 [AS-068].	given. The Applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. ECC would request a more detailed explanation of the applicant's assessment methodology. Additionally, Historic England are the statutory consultees for scheduled monuments and it is assumed they will comment in this respect c) The levels of harm to identified non designated heritages primarily affect below ground archaeological assets. It is understood that non-designated buildings were scoped out of full assessment as they are classified as low value as part of the methodology. Regarding archaeological remains – this is included within the **ECC LIR (REP1-161)**. The level of harm cannot be fully realised until intrusive archaeological investigations are complete and results provided for review.	In summary, the assessment of harm was undertaken on the design shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [Revision B]** and **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. Further to the detailed assessment presented in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and its appendices of the proposed route of the Project an assessment of the Limits of Deviation was undertaken across the Project. This sensitivity testing of the Limits of Deviation was undertaken using GIS data and site/heritage asset knowledge from the detailed assessment and applying the understanding of likely effects from the detailed assessment. From this six areas were identified where restrictions on the Limits of Deviation (as secured through commitment GG34 of **7.2 Outline Code of Construction Practice [Revision D]**) have been introduced. Outside of those areas the review did not determine that there would be sufficient change in the setting, from that considered in the detailed assessment, for the assessed effects to be greater than presented in the assessment in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. The Applicant has responded regarding the approach to assessment of non-designated heritage assets in response to ExQ1 HE 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Regarding assessment of archaeological remains, the Applicant has responded on this in ExQ1 HE 1.43 **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
		Chelmsford City Council CCC consider that the harm to designated heritage assets is underestimated in some instances and that NDHAs are not adequately assessed. See **CCC LiR (REP1 -153)** pages 59-68. Details of the harm to designated heritage assets are repeated here, for all other harm, please refer to the extensive consideration in the LIR. • Brickfields (1122129, identified as Bishops Hall Cottage) is a small C17/C18 thatched roof cottage. Its		The Applicant responded in detail to the points raised in Chelmsford City Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			rural setting makes a moderate contribution to its significance. Its heritage value of medium is agreed. It is not agreed that its setting does not include the development consent area. The woodland screening to the south partly mitigates the impact, but not fully. It is considered there would be a low impact, resulting in a minor effect. • Goodmans Farmhouse (1122135) and Barn (1171336) – medium impact on setting (rather than low), due to the considerable change to the rural landscape with which it is historically associated with, existing trees do not fully mitigate the impacts, particularly in winter months. Resulting in a moderate effect, which is significant. • Stonage Farmhouse (1172474) and Barn (1122042) – low level of harm not agreed – medium level due the change to the rural setting with which the buildings are historically associated, existing trees do not fully mitigate the impacts, particularly in winter months. Resulting in a moderate effect, which is significant. • Chatham Hall (1338512) - low level of harm not agreed – medium level due the change to the rural setting, existing trees do not fully mitigate the impacts, particularly in winter months, as demonstrated in viewpoints HE8c and 16.16, resulting moderate effect, which is significant. • Church of St Mary and St Laurence (1122058) Great Waltham is excluded. It is not agreed the setting does not extend to the order limits. The wider rural setting of the village is part of how the church is experienced and there are important views of the church tower from the north/northwest/northeast where the proposed pylons would be visible as a distant backdrop (as shown in visualisation HE15e), which would impact on how it is experienced as a rural village church. Due to the screening and distance the impact would be low to an asset • Rose and Crown, Great Waltham (1122116) – low impact on setting (rather than negligible) resulting in a minor effect, due to change to rural setting with partial screening. • Lace cottage, Great Waltham (1122117) – medium impact (not low) due to change to rural setting with limited screening, resulting in a moderate effect, which is significant.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Great Waltham Conservation Area (CA55) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable contribution to its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant. • Little Waltham Conservation Area (CA56) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable impact on its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant. • Balls Farmhouse (1305428) – high impact on setting (rather than medium) due the comprehensive change to the rural landscape setting (i.e. see viewpoint HE16) which it is historically associated with and makes a considerable contribution to its setting, resulting in a major/moderate effect, which is significant. • 1 and 2 Larks Lane, Great Waltham (122083). low impact (rather than none) due to impact rural setting, resulting in a minor effect. • Vault West of Partridge Green Farm (1306289) – considerable to change to the sense of an isolated rural setting, giving a medium impact on setting (rather than low), resulting in a medium effect which is significant. • Coptfold Hall Barn (1247784) – medium impact (rather than low) due to impact on the rural setting with which the asset is historically associated, even with partial screening by adjacent modern farm buildings, resulting a moderate effect, which is significant. On archaeology: a) relates to above ground heritage assets so will be responded to by Historic Buildings b) same for above ground and Historic England are the statutory consultees for scheduled monuments so they will comments on SMs c) For archaeological remains this is discussed in the LIR. The level of harm cannot be fully realised until intrusive archaeological investigations are complete and results provided for review.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Brentwood Borough Council a) BBC supports ECC Place Services' view that it is in agreement with the scoping of heritage assets based on the methodology provided. b) BBC supports ECC Place Services' view that it is in agreement with the level of harm, on the assumption that this is based on the route line given – the applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the applicant's assessment methodology. c) BBC supports ECC Place Services' view that the levels of harm to identified non-designated heritage assets primarily affect below ground archaeological assets and therefore refers to comments provided elsewhere by the archaeological advisor.	Please see response to Essex County Council HE 1.9 above.
			South Norfolk District Council The Examining Authority is referred to SNDC's Relevant Representation where the council's position is set out in detail.	The Applicant responded to the South Norfolk District Council Relevant Representation in detail in Appendix AA of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**.
			Colchester City Council This was dealt with in the **CCC LIR [REP1-156]**. We are in agreement with the scoping of heritage assets based on the methodology provided. We are in agreement with the level of harm, on the assumption that this is based upon the route line given. The applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the applicant's assessment methodology. Historic England are the statutory consultees for scheduled monuments (SMs) so they will comment on SMs.	Please see response to Essex County Council HE 1.9 above. .

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			For archaeological remains this is discussed in the LIR. The level of harm cannot be fully realised until intrusive archaeological investigations are complete and results provided for review. It is our understanding that non-designated buildings were scoped out of full assessment as they are classified as low value as part of the methodology.	
			Thurrock Council The Council are in agreement with the scoping of heritage assets based on the methodology provided. a) The Council agree with the level of harm, on the assumption that this is based upon the route alignment given. The Applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the Applicant's assessment methodology. b) The levels of harm to identify non designated heritages primarily affect below ground archaeological assets. It is the Council's understanding that non-designated buildings were scoped out of full (setting) assessment as they are classified as low value as part of the methodology.	Please see response to Essex County Council HE 1.9 above.
			Braintree District Council 1. The Council are in agreement with the scoping of heritage assets based on the methodology provided. 2. The Council are in agreement with the level of harm, on the assumption that this is based upon the route line given. The Applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the Applicant's assessment methodology. As per our response to question ALT	Please see response to Essex County Council HE 1.9 above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			1.9, it does not appear that the worst case effect has been taken into account. 3. It is our understanding that non designated buildings were scoped out of full assessment as they are classified as low value as part of the methodology.	
			Babergh and Mid Suffolk District Council a) BMSDC are in agreement with the scoping of heritage assets based on the methodology provided. b) Based on a desk based review of the applicant's assessments for the Scheduled Monuments, the Conservation Areas and the Grade I and Grade II* listed buildings and some nearby Grade II listed buildings, the assessments of harm to significance are mostly agreed. Not all assessments for all Grade II listed buildings have as yet been reviewed and checked. With regard to the Grade II listed Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806), these assets are located on the northern edge of the Mellis Conservation Area and as such we would disagree with the assessment of no harm to their significance during the Operational phase of the project. We would suggest there will be a Low level of less than substantial harm to the significance of these buildings due to the change to their setting, in line with the effects on the Conservation Area. Where assessments are agreed, this is on the assumption that these are based upon the route alignment given. The applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document [APP-133] (Proposed Project Design) and [APP-134] (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the applicant's assessment methodology. c) The levels of harm to identified non designated heritages primarily affect below ground archaeological assets, please refer to comments provided by the archaeological advisor. However, the impact on the setting of a number of farmsteads (in many cases associated with listed buildings) assessed by the applicant to be of Medium value have been carried out and appear to align with the assessments made for the associated listed buildings. Not all assessments have as yet been reviewed by the	The Applicant responded regarding the assessment of Hall Farm House (1181726) and Barn About 30 metres West of Hall Farm House (1032806) in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**. For other points please see response to Essex County Council HE 1.9 above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Council. No setting assessment was carried out by the applicant for other non-designated buildings assessed to be of low value as part of their methodology.	
			Suffolk County Council SCC Archaeological Service a) BMSDC and, where required, Historic England will provide comments on Historic Buildings that have been Scoped Out of further assessment. For archaeology, the proposals for Scoped Out Walkover survey are acceptable. b) BMSDC and, where required, Historic England will provide comments on Historic Buildings that have been Scoped Out of further assessment. c) For archaeology, the criteria used to assess harm to non-designated heritage assets are broadly acceptable as an initial appraisal. However, SCCAS advises that evaluation would be required to provide an appropriate understanding of the presence, absence, significance, character, extent and state of preservation of any archaeological heritage assets within the Order Limits (areas of project impact) and thereby quantify the schemes impact upon those assets and inform an appropriate mitigation strategy. The Applicant must acknowledge that the archaeological heritage assets currently mapped by the project does not represent the full archaeological record, as archaeological heritage assets that are currently unknown will be identified by the project. Additionally, recorded archaeological heritage assets heritage value may change following intrusive archaeological evaluation, and the areas beyond the recorded assets and sites may contain as yet unidentified archaeological heritage assets. SCCAS considers that the absence of an archaeological potential assessment within the **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is a missed opportunity for the project, however, SCCAS believe that an appropriate programme of post-consent work can be secured by an approved **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**.	The Applicant has provided detailed responses regarding archaeology in response to HE 1.43, HE 1.44, HE 1.45, HE 1.46 and HE 1.47 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
			Tendring District Council a) Tendring District Council refers to the position of Essex County Council, as Place Services are leading on all matters relating to the scoping out of	The Applicant responded to Tendring District Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Designated and Non-Designated Heritage Assets, including those within the TDC administrative area. b) Disagree – for commentary see TDC's LIR (Section 7 (EACN Location etc), Section 10 (Cumulative Effect) and Section 15 – (Historic Environment) c) In respect of the level of harm assessed in relation to Non-Designated Heritage assets (last part of question HE 1.9): TDC Disagree – for commentary see TDC's LIR (Sections 10 (Cumulative Effect) and Section 15 – (Historic Environment).	
HE 1.10	The applicant	**Limits of deviation** Numerous councils in their Local Impact Reports (LIRs) raise concerns over the LoD and the effect that any subsequent movement in proposed pylons may have on the significance of nearby heritage assets. The contents of Commitment GG34 in the outline CoCP is noted in this respect **[APP-300]** but this appears primarily to address archaeological and other concerns (with the odd exception). Set out: a) Whether changes to the LoD were considered in the overall heritage harm assessment. b) In relation to those heritage assets that, through your assessments in [APP-215], would be subject to a mid-less than substantial level of harm during both construction and operation, explain the options available to you to reduce the vertical and horizontal LoD in the vicinity of those assets. c) If you consider there to be none, provide evidence of the constraints to support this position. d) The potential changes in levels of harm that could occur to heritage assets along the route were pylons and OHLs to be sited closer, and/or be taller. e) Any subsequent changes in the level of heritage harm which may occur as a result of such movement. f) Whether GG34 should and will be expanded in the light of the above. g) Whether more certainty should and can be given to the location of pylons in the vicinity of heritage assets.	**Chelmsford City Council** CCC welcomes this clarification. Variations in alignment or height could notably increase heritage impacts.	The Applicant provided a detailed response to HE1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** which provides the clarification requested by the ExA and welcomed by Chelmsford City Council and addresses the second comment.
HE 1.12	All local authorities Historic England	**Heritage visualisations - 1** A range of heritage visualisations are provided **[APP-350]** and **[APP-351]**. All local authorities and Historic England are asked to confirm: a) Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets.	**Essex County Council** a) ECC notes that viewpoints were agreed as part of the pre-planning process. b) ECC has not requested any additional visualisations at this stage. On the same basis as ECC's response to Question HE1.9, ECC would request further clarification about the Heritage Viewpoint visualisations and the LVIA visualisations (some of	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		b) In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?	which have been used to inform heritage impact assessments). Are the visualisations based on the pylon locations and overhead line alignment shown in the relevant figures in documents **APP-342** to **APP-351** or worst-case pylon locations and overhead line alignments based on the LoD parameters?	(submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Chelmsford City Council CCC consider the viewpoints give an adequate representation of the impacts in the agreed locations.	Noted and welcomed.
			Brentwood Borough Council a) BBC shares ECC Place Services' view that the viewpoints for Heritage visualisations were agreed as part of the pre-planning process b) BBC supports ECC Place Services' position that they would request further clarification about the Heritage Viewpoint visualisations and the LVIA visualisations (some of which have been used to inform heritage impact assessments) and whether they are based on pylon locations and OHL alignment shown in the relevant documents **APP-342** to **APP-351** or are worst-case pylon locations and OHL alignment based on the LoD parameters.	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** (submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Norfolk County Council NCC defers on built heritage matters to South Norfolk District Council	The Applicant has provided a response regarding these viewpoints in response to HE 1.13 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
			South Norfolk District Council SNDC remains concerned that the viewpoints provided for St Remigius do not adequately represent the church's setting or the visual impact of the proposed pylons. For HE2i, the pylons will lie very close above and slightly forward of the viewpoint and are therefore likely to appear more imposing than suggested by the current photographic angle. For HE2ii, there are additional positions within the churchyard where pylons and wires would be more visible. These views are important because the churchyard forms part of the asset's immediate context and contributes to the way its significance is experienced. We note the proposal for an additional heritage viewpoint to the north of the church and consider it important that this also includes the listed war memorial, to assess interrelated views of both listed structures and their shared historic associations. SNDC also notes the Applicant's explanation that heritage viewpoints would not duplicate landscape viewpoints, and that landscape viewpoints should also be	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			referred to when assessing heritage effects. In this regard, VP1.22e is useful for understanding the impact of pylons on the setting of the church and its relationship with the valley. SNDC additionally have concerns regarding viewpoint HE21 (Elm Farmhouse). The principal impact on the setting will be experienced when approaching from the east along Fundenhall Road. While SNDC acknowledge the safety limitations for roadside photography due to the constrained verge, the council asks whether alternative photographic methods could be used to capture this key approach view.	
			Colchester City Council The viewpoints were agreed as part of the pre-planning process. CCC have not requested any additional visualisations at this stage. On the same basis as our response to Question HE1.9, we would request further clarification about the Heritage Viewpoint visualisations and the LVIA visualisations (some of which have been used to inform heritage impact assessments). Are the visualisations based on the pylon locations and overhead line alignment shown in the relevant figures in documents **APP-342** to **APP-351** or worst-case pylon locations and overhead line alignments based on the LoD parameters? It is important to CCC that it is the latter.	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The Applicant has responded regarding the Limits of Deviation in response to HE 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** (submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Thurrock Council The Council consider that the viewpoints were agreed as part of the pre-planning process. On the same basis as the Council's response to Question ALT1.9, the Council would request further clarification from the Applicant about the Heritage Viewpoint visualisations. Are the visualisations based on the pylon locations and overhead line alignment shown in the relevant figures in documents APP 342 to APP-351 or do the visualisations show the worst-case pylon locations and overhead line alignments based on the LoD parameters. The Council considers that no further visualisations are considered to be required.	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** (submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Braintree District Council a) The viewpoints were agreed as part of the pre-planning process. b) The Council have not requested any additional heritage visualisations at this stage. On the same basis as our response to Question HE1.9, the Council	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			would request further clarification about the Heritage Viewpoint visualisations and the LVIA visualisations (some of which have been used to inform heritage impact assessments).	Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** (submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Babergh and Mid Suffolk District Council The viewpoints were agreed as part of pre-submission engagement. On the same basis as our response to Question ALT1.9, BMSDC request further clarification from the applicant about the Heritage Viewpoint visualisations. Are the visualisations based on the pylon locations and overhead line alignment shown in the relevant figures in documents APP-342 to APP 351 or do the visualisations show the worst-case pylon locations and overhead line alignments based on the LoD parameters? No further visualisations are considered to be required.	The visualisations are based on the design as shown on **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [Revision B]**. The point regarding whether visualisations should present the worst-case scenario in terms of the Limits of Deviation has been responded to at action number 8.2b of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** (submitted at Deadline 4) and action number 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** (submitted at Deadline 4).
			Suffolk County Council SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to above-ground heritage assets.	
			Historic England In our written representations we have commented on a number of heritage assets where we have questioned the detail of the applicant's assessment of the impact of the proposed development on their significance, including the location of viewpoint images. We do generally concur with the majority of the viewpoints and even where we have a difference of opinion, in most cases we agree with the applicant's conclusions about impact. We are therefore content with the viewpoints overall. There are however four assets where we would welcome amended or additional images in order to support the examination and provide additional evidence on the likely impact. These are set out below. **Roydon Hall** (NHLE no. 1033215) and barn to NW (NHLE no. 1284584). We have previously requested the applicant provides a viewpoint looking from west of this complex to include the front of the Hall and from a suitable location to show the appearance of the proposed pylons behind the listed buildings to the east. **Creeting Hall** (NHLE no. 1352073). We do not consider the supplied viewpoint (VPHE35) sufficient to illustrate the potential visual impact on the listed building. This	An updated viewpoint location and visualisation is proposed for Creeting Hall, as set out in response to HE 1.13 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and has been submitted at Deadline 4 in **8.9.1.3 Additional Visuals for ExQ1 - HE1.13 [Revision A]**. An additional viewpoint and visualisation for Roydon Hall will be produced as requested and submitted at a later deadline. Viewpoint HE39, located south of Chobbings Farmhouse, provides a good representation of the scale of the pylons in the landscape beyond the listed building and therefore it is not considered proportionate to undertake an additional viewpoint for this asset. The Applicant has responded to Historic England's comments on Chobbings Farmhouse in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 85). The Applicant has responded to Historic England's comments on Hylands Park in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 85). Two viewpoints have been provided to inform the assessment of this heritage asset, 6.15 and 6.26.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			image, taken in the rear garden of the listed house from where pylon RG164 would be some 190 m away, suggests it would be screened by vegetation on the garden boundary. However, in this precise view the upper part of the pylon seems to be masked by trees. It is possible it would be more clearly seen by moving the viewer slightly to the left and slightly raising the view. From that viewpoint the pylon might be clearly seen and given the distance have a pronounced, even dominant effect. An additional image might better illustrate this. We have also noted that another additional viewpoint taken from a location to the west of the Hall on the higher ground could show the proposed pylons to the east of the building which could illustrate the impact on its landscape setting. **Chobbings Farmhouse** (NHLE no. 1306286). The applicant's assessment states that the setting of this asset does not extend to the order limits. However, we consider that views of the proposed pylons would be possible from the rear of the property with the potential to have a visual impact. A viewpoint image from the rear, looking towards the order limits and selected to avoid the thickest vegetation on the boundary would illustrate this effect. **Hylands Park** (NHLE no. 1000197). The applicant's assessment has not considered the potential visual impact on the western side of the Registered historic park. Should the applicant review this a viewpoint image from the western edge of the park looking towards the proposed pylons could be helpful in establishing the effect.	
			Tendring District Council a) Viewpoint Selection – Strong Disagreement TDC strongly disagrees that the Applicant's chosen viewpoints adequately reflect the potential impacts of the proposal on heritage assets within and around Ardleigh. It appears as though, in a heritage context, only two visualisations in document reference **APP-51** (see pages 22-26 of this document) have been provided for Ardleigh – Ardleigh is a historic settlement with a large conservation area and one of the settlements most severely affected along the entire project route. These viewpoints are: • Poorly located, with both positions situated adjacent to or in front of dense vegetation, tree belts, or buildings, which significantly obscure or filter views to the north where the new pylon arc will be located.	The viewpoints located in and adjacent to Ardleigh were informed by the key views identified in the conservation area appraisal that would be affected by the Project. Viewpoint HE25 is located in the centre of the village and orientated towards the church to provide a representation of the likely visibility of the Project from the historic core of the village. Viewpoint 3.11 is located on the northern edge of the village, beyond any screening provided by hedgerows or buildings and provides a 270º visualisation of the Project to the north-east, north and north-west of Ardleigh. Its location is also informed by an identified key view but the siting was moved further north to avoid any screening that would be present from the location of the key view. The visualisations have been used to inform the historic environment assessment, but this is also informed by sites visits undertaken by the Project team and desk-based research as set out in **6.11.A1 Environmental**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Nowhere near sufficient to capture the extent, magnitude, or nature of heritage impacts on Ardleigh's Conservation Area, its numerous Grade II and Grade II* listed buildings, and its Non Designated Heritage Assets (NDHAs) (for exact locations of these – pls see remainder of the response to this question as well as TDCs response to ExA Q1 HE. 141 further below). TDC has repeatedly raised this issue – including in thematic heritage meetings, statutory and nonstatutory consultations, and in both its Relevant Representation and Local Impact Report. Despite this, the Applicant has not provided the additional heritage visualisations necessary to meaningfully assess impacts in the Ardleigh area. Given that the pylon arc passes: • Close to the northern and northeastern boundary of the Ardleigh Conservation Area, and • with the majority of pylons located within 300 metres of the Conservation Area's northern edge, and as close as 250m from pylond TB11. Therefore, TDCs position is that the current viewpoint selection is fundamentally inadequate and does not allow the ExA to understand the scale of change affecting these heritage receptors. b) Additional Heritage Visualisations – Required Viewpoints TDC submits that a substantial number of additional visualisations are required from clearly defined and specific locations to properly assess heritage impacts in and around Ardleigh. Below is a detailed list of required viewpoints, with precise location descriptions and heritage justification. 1. Ardleigh Conservation Area – Northern, NorthWestern & NorthEastern Edges Reason: These edges directly face the pylon arc, with pylons positioned extremely close to the conservation area boundary. Visualisations are needed to assess how the setting, rural hinterland, and character of the Conservation Area will be harmed from these sensitive edges. Exact locations required: • Along Dead Lane and the footpaths immediately north of the Conservation Area. • The northeastern boundary of the conservation area by the cemetery and allotments	**Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The locations of viewpoints and the format of visualisations were discussed with all Local Planning Authorities and their historic environment advisors in spring 2025, and as of April 2025 the Applicant understood that these were agreed with the historic environment advisors to Tendring District Council, although it was subsequently indicated that the planning team did not agree with the view of their historic environment advisors. The Applicant considers that the visualisations already provided for Tendring provide a proportionate representation to inform the historic environment assessment.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• The northwestern edge, just off Rookery Close and Dedham Road. • Reverse viewpoints from the north side of the pylon arc, looking southward back toward Ardleigh, to capture how the pylons would visually dominate key heritage receptors. 2. St Mary the Virgin Church (Grade II*) – Ardleigh Required viewpoints: • From Ardleigh Close, located directly to the east of the church. • From within the churchyard and where views are possible through trees and vegetation towards open sky northwards (ie not areas carefully selected where existing vegetation will obscure view of the sky looking northwards), and particularly to the front and north of the church and where open views towards the proposed pylon arc will be possible. Reason: The church is the most significant designated asset in the settlement and the change to its setting must be robustly evidenced. 3. The Vicarage (Grade II), The Street, Ardleigh (CO7 7LD) Required viewpoints: • From directly in front of The Vicarage (on The Street) and in front of the two storey cottages (along The Street) looking northwards towards the proposed pylons arc Reason: The Vicarage has historically strong visual and functional associations with St Mary's Church, and sensitive views from these areas facing directly towards the pylon arc are essential to understand the heritage impacts from this position. 4. Badliss Hall and Barn West of Badliss Hall (Both Grade II Listed) Location: West of Ardleigh, approximately 500m south of Ardleigh Reservoir. Required viewpoints: • From within the grounds of Badliss Hall, looking north and northeast. • From the Barn to the west of Badliss Hall, oriented towards the line of pylons south of Ardleigh Fishing Lake.	

Reason:

These assets sit in an elevated position above the lack north of Little Bromley Road with clear, open rural settings highly sensitive to vertical intrusions.

5. Hungerdowns

Location: Hungerdown Lane.

Required viewpoints:

- From both farmsteads and their curtilages.
- Specific views looking north and northeast towards the EACN and associated pylons emerging on its western edge.

Reason:

Bounds Farmhouse is approximately 170m from both the EACN and emerging pylons – representing one of the closest heritage–pylon proximities anywhere in the scheme.

6. Grade

Assets include:

- Fountain Farmhouse
- Wick Farmhouse and Wick Farm Barn
- Bloomfields Farmhouse and Bloomfields Farm Barn

Required viewpoints:

- From each asset's principal elevation and associated setting.
- Across open farmland to the north and northeast where the pylon arc will be visually prominent.

Reason:

This cluster of heritage farmsteads forms a coherent historic rural landscape that will experience pronounced setting impacts.

7. Western

Required viewpoints:

- From the western boundary of the Conservation Area.
- Including viewpoints from the two Grade II Listed buildings on the south side of Colchester Road, located at the Conservation Area's westernmost extent.

Reason:

The western part of the Conservation Area rises gently with potential views toward the proposed pylon arc, or at the very least it should be demonstrated to what extent the pylons will or will not be visible from these viewpoints.

Conclusion

The Applicant's current visualisation set is therefore insufficient to thoroughly assess impacts on the heritage assets and historic landscape of Ardleigh. TDC therefore requests that the ExA require the Applicant to produce

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			comprehensive, accurate visualisations from all locations listed above to enable a lawful and robust assessment of heritage impacts.	
HE 1.23	The applicant	**Windmill House** The ExA noted on their visit the prominence of Windmill House, at Minnow End across the Chelmer Valley from Chathamhall Lane. Provide an assessment (or signpost to an assessment) of any harm that the proposed development would cause to this non designated heritage asset.	**Chelmsford City Council** CCC consider that there would be a high level of harm to the setting of Windmill House NDHA, see CCC LiR (REP1-153), page 66.	The Applicant responded to the points raised in relation to NDHA in Chelmsford City Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
HE 1.28	The applicant	**Southwoods Farm, Chelmsford** ES Chapter 11 **[APP-208]** considers that the effect on Southwoods Farm will be significant during construction but not during operation. It is noted however that the effect upon the separately listed Barn at Southwoods Farm is considered significant for both construction and operation. Provide further justification for the findings of harm on Southwoods Farm.	**Chelmsford City Council** CCC welcomes this clarification. CCC agree with the applicant's assessment of permanent impacts being lower for Southwoods Farmhouse than the farm buildings due to the tree screening present.	Noted and agreement is welcomed. The Applicant responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
HE 1.29	The applicant	**Church of St Mary, Buttsbury** The listing status for the Church is defined differently in separate parts of **ES Chapter 11 [APP-208]** as either Grade II or II*. Confirm the current status and amend if necessary.	**Chelmsford City Council** Church of St Mary, Buttsbury (1264434) is Grade II* listed Church of St Mary, Stock - 1264434 | Historic England	Noted. The Applicant responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
HE 1.34	The applicant	**Highfields Farmhouse and Coney Byes, West Bergholt** The ExA noted these Grade II listed heritage assets on its visits. Both assets would appear to have reasonably clear views to their south and west respectively over a reasonably steep sided valley in which the pylons are proposed to be sited. Your assessment of harm to these assets consider that both will have a lower less than substantial harm caused to their significance from the proposed development. Provide further justification for this assessment.	**Joanne Lesley Elliott & Richard James Guy Davies** We are encouraged to see the inspectorate has challenged The Applicant on the assessment of harm to [REDACTED] and [REDACTED] West Bergholt. We strongly disagree with the assessment of harm and raised this with NG in the very first consultation. We set out a number of reasons we considered the effect to be SIGNIFICANT and also showed the screen shots of National Grid's own visual representation of the view from [REDACTED], the shots shown only show the view to the East and to the South, a panoramic scan would show a large angled pylon in between. The sealing end compound at Crabtree Lane would also be visible – it is not located in a dip as stated in the documentation. Our response to NG in the consultation is also attached below which provides further details *[see submission document].* The prominence of the pylons across the valley would also dominate the views from path around the west side Hillhouse Wood, an ancient woodland on one side of the valley (Bluebell Wood) and a hugely popular walk for locals.	The Applicant responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Mark Ian Weeks Passmore In HE 1.34 the Inspectorate has challenged National Grid's assessment of the damage to [REDACTED]. We strongly disagree with the assessment of harm and raised this with NG at the first consultation. We consider that the impact of the proposed pylons on these properties would be very significant and the screen shots of National Grid's own visual representation are very misleading. The height of the proposed pylons is such that they would totally dominate the surrounding area – the tallest trees within the vicinity are some 20 metres high compared with pylons oof fifty metres, i.e. an additional 30 metres. The NG assessment stated that it was probable that the pylons would be seen – this is clearly wrong as there is no doubt that they would not just be seen but would be overbearing. The Project as proposed would cause significant lasting harm. The project includes approximately 159 km of new overhead line supported on approximately 510 steel lattice pylons at approximately 50 metres in height, with approximately 25 km of underground cabling, some of which is located through the Dedham Vale National Landscape, and six new Cable Sealing End (CSE) compounds. National Grid has demonstrated that their proposed pylons, sealing end compounds and the EACN whilst not built within the vale will be hugely visible from within it. They themselves say that up to 23 pylons will be visible from up to half of the vale and up to 35 pylons in places. Regulations state that pylons should not be visible from within an AONB but in this case it is well documented that these proposals are not compliant. The construction would take several years and would create vast swathes of destruction to the environment and to natural habitats. It would severely dislocate the lives of people living along the route and further afield. Tourism would be badly affected. Such damage could not recover during the foreseeable future and much would be permanent. This cannot be described as "minor" or "insignificant" damage. It is enormous and will destroy the natural beauty and most social qualities of the vale for all future generations. The route MUST be modified to 'avoid altogether' both the Vale and its setting as required in planning policy specifically set out to protect it. 'Even residual damage is unacceptable'. Similarly the project should not be permitted to destroy other rural settings including the Colne Valley. The destruction and collateral	The Applicant responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The assessment of effects of the Project on the special qualities of Dedham Vale National Landscape is presented in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. The Project would result in significant adverse effects on some of the special qualities of the Dedham Vale National Landscape during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant. The fact that the Project will be visible from within the Dedham Vale National Landscape is not disputed. Figures A13.5.6 to A13.5.12 contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility of the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. In addition, the ZTV only takes woodland blocks into consideration (modelled at 15 m in height), as explained in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** (paragraph 13.6.6): '*Woodland blocks were modelled into the ZTVs, using the National Forest Inventory mapping dataset which was assigned a height of 15 m.*' It does not consider hedgerows or trees that do not form part of this data set, and which will filter views in practice. In accordance with National Policy Statements EN-1 (2024) and EN-5 (2024), the Applicant has applied the strong presumption for 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

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			damage that will inevitably arise from the project as currently proposed is not necessary. It is most regrettable that NG have not properly assessed other options, in particular an offshore route.	the EN-5 (2024) policies. 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 (2024) policies on undergrounding.
			Penelope Ann Richards In HE 1.34 the Inspectorate has questioned National Grid's assessment of the damage to [REDACTED]. We strongly disagree with the assessment of harm and raised this with NG at the first consultation. The nearest pylon, as proposed, is a corner pylon and therefore more substantial than most. The proposal is to site it in the middle of three listed house and this must be in contravention of the planning regulations relating to listed properties. The proposed site of this pylon will not be accessible from the planned purpose built road which will be the far side of the river and a small bridge. The access to this part of the Colne valley is only along [REDACTED], a single track road on a hill and not suitable for HGV's. We have no doubt that the impact of the proposed pylons on these properties would be very significant and the screen shots of National Grid's own visual representation are very misleading. The height of the proposed pylons is such that they would totally dominate the surrounding area – the tallest trees within the vicinity are some 20 metres high compared with pylons of fifty metres, i.e. an additional 30 metres. The NG assessment stated that it was probable that the pylons would be seen – this is clearly an inappropriate assessment as there is no doubt that they would not just be seen but would have a huge and unpleasant impact. [REDACTED] is a Grade II listed building with a peg tile roof and overlooking the Colne valley. Planning regulations require that the nature and setting of such a property be preserved. It is a landmark for photographing "big sky" vistas – the proposed pylons would destroy that benefit. Specific points that relate to the property at [REDACTED] are as follows: The nearest proposed pylon is a corner pylon and directly beside the boundary of this property, within 10 metres. All activities pursued in this space will be overwhelmed by its presence. It would seriously affect the use of the house and its outbuildings including an Air BnB business. The area surrounding [REDACTED] has a wide variety of flora and fauna including hundreds of types of wild flower, veteran trees, and many species of animals, such as stoats, foxes and deer, and of birds including owls,	The Applicant responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In respect of the points raised in relation to biodiversity through careful routeing and siting the Applicant has sought to reduce potential impacts on biodiversity including priority grassland, wetland, woodland, hedgerows and veteran trees, as well as protected species such as birds. As part of the environmental assessment process, a suite of ecological surveys has been undertaken and the impact assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Where impacts have been unavoidable mitigation has been included within the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. Following the implementation of mitigation there will be no residual significant effects on biodiversity features. The Applicant does not have sufficient information to comment on the business and therefore seeks clarification regarding the location of the visitor accommodation.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			woodpeckers and buzzards. It should also be noted that, [REDACTED] I have not received any communication to organise a visit from NG or their agent to discuss the prospective impact and damage of this project on my property.	
HE 1.37	The applicant	**Mitigation** Many Council LIRs refer to the issue of mitigation, noting that for many heritage assets mitigation of any adverse effects caused by the proposed development is effectively not possible or achievable. Such comments also refer to the potential for separate mitigation funds or agreements. Respond to such comments.	**Chelmsford City Council** CCC consider that the schemes mitigation is inadequate. See CCC LiR (REP1- 153). Mitigation and/or compensation measures should be required via the legal agreement.	The Applicant responded to the points raised in relation to mitigation in Chelmsford City Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
HE 1.38	The applicant	**Non designated heritage assets (NDHA)** Many submitted LIRs raise concerns over the consideration given to NDHAs in **ES Chapter 11 [APP-208]**. While noting the responses submitted at Deadline 1, provide further information and justification for the treatment of NDHAs in your assessment of heritage harm, and how this accords with paragraph 5.9.31 of NPS EN-1 (2023).	**Chelmsford City Council** CCC welcomes clarification. CCC consider that NDHAs are not adequately represented in the historic Environment evidence base, see **CCC LiR (REP1 153)**	The Applicant responded to the points raised in relation to NDHA in Chelmsford City Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and responded to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, all NDHAs located within the 250 m study area have been assessed to determine their value. Following this an assessment was made that identified there was no chance of significant effects arising only from changes within the setting of low or negligible value non-designated heritage assets outside the Order Limits, where there is no potential for physical impact. As set out in Table 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** negligible value assets cannot experience a moderate or major effect and low value assets could only experience a moderate effect if a high magnitude of impact was concluded. As the nature of permanent change within setting for this Project arises from the presence of OHL this allows rural/agricultural activity around and underneath it and therefore it would not be reasonable to conclude a high magnitude of impact. Therefore, in line with NPS EN-1 the proportionate approach meant that detailed setting assessment would not be undertaken in these cases. Proportionality doesn't require assessment of every last asset as long as significant effects are identified, which they are. Other than in this case NDHAs have been fully assessed.
HE 1.39	All Essex local authorities	**Protected Lanes** Please provide further evidence relating to the protected lanes in your respective administrative areas which would in your opinion be negatively impacted by the proposed development, including evidence over why they should be considered as NDHA.	**Essex County Council** The Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of the districts using a methodology which included desk-based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and	The identified protected lanes are assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

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			aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts relevant Strategic Policies. Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity, if a lane fails to score 2 for integrity it did not proceed to the next stage. A score of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)" Where there will be direct physical impact to the lane, for instance through groundworks associated with undergrounding, then the integrity of the lane may be impacted through removal of historic components of the lane such as roadside greens or banks etc. and possible 'improvements' such as kerbing, inspection pits, markers etc. Should the physical works required equate to moderate improvements or loss of historic fabric then the lane could fail to meet the threshold for historic integrity and not meet the criteria for a Protected Lane. There is one lane in Colchester District where this could occur within an undergrounding section: Crabtree Lane, Little Horkesley (COLLANE24). Further lanes may be impacted to a lesser degree in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane. These include Protected Lanes in Colchester, Chelmsford, Brentwood and Braintree (Braintree Lanes will be responded to separately): Colchester: Fossetts Lane, Church End (COLLANE 8) and Fossetts Lane, Church End (COLLANE 9) Chelmsford: Boreham Lane Rd, Great Leighs (CHLLANE 4) Park Hall Lane (CHLLANE 36) Goodmans Lane (CHLLANE 38) Larks Lane, Great Waltham (CHLLANE 17) Newney Green, Writtle (CHLLANE 21) Brentwood Little Hyde Lane, Fryerning (BRWLANE10) To mitigate any loss and disruption to the Protected Lanes the Applicants include a section on Protected Lanes (Section 7.9) in the **LEMP (Revision C- REP2-**	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the **Code of Construction Practice (Revision B – REP2-015)**. Where possible they aim to minimise disruption from physical works and maintain elements of the Protected Lane. Where removal of historic fabric and features is required this will have a direct impact on the historic integrity of the lane.	
			Chelmsford City Council CCC adopted Local Plan (2020) policy DM14 for non-designated heritage assets supporting text notes that Protected Lanes will be treated as NDHAs. Protected Lanes are identified in ECC's studies, which form part of the Local Plan evidence base. 2009_Protected_Lanes_Report CCC sets out its position on harm to protected lanes in the LIR (REP-153), page 57, paragraph 8.190, page 61 paragraphs 8.205 and 8.206 refer. These advise that Larks Lane (Great Waltham) is agreed to be of low value, but it is considered there would be a medium impact on its significance because the pylon routes influences much of the length of the lane and how it is experienced in a rural landscape, resulting in a minor effect. Goodmans Lane and Paulk Haul Lane (Great Leighs) are considered to be of medium value because they have considerable character, a high degree of surviving features (scoring highly on the ECC protected lanes assessment - 22 and 21 respectively, 14 being the threshold for protected lane status) and have group value with the designated heritage assets at Hole Farm and Goodmans Farm. A notable amount of the experience of the assets would be affected -the impact is medium, therefore resulting in a moderate effect, which is significant. Additionally, the Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of the districts using a methodology which included desk-based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts relevant Strategic Policies. Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity, if a lane fails to score 2 for integrity it did not proceed to the next stage. A score	The identified protected lanes are assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)" Where there will be direct physical impact to the lane, for instance through groundworks associated with undergrounding, then the integrity of the lane may be impacted through removal of historic components of the lane such as roadside greens or banks etc. and possible 'improvements' such as kerbing, inspection pits, markers etc. Should the physical works required equate to moderate improvements or loss of historic fabric then the lane could fail to meet the threshold for historic integrity and not meet the criteria for a Protected Lane. Further lanes may be impacted to a lesser degree in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane. These include: • Chelmsford: • Boreham Lane Rd, Great Leighs (CHLLANE 4) • Park Hall Lane (CHLLANE 36) • Goodmans Lane (CHLLANE 38) • Larks Lane, Great Waltham (CHLLANE 17) Newney Green, Writtle (CHLLANE 21) To mitigate any loss and disruption to the Protected Lanes the Applicants include a section on Protected Lanes (Section 7.9) in the LEMP (Revision C- REP2-019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the Code of Construction Practice (Revision B – REP2-015). Where possible they aim to minimise disruption from physical works and maintain elements of the Protected Lane. Where removal of historic fabric and features is required, this will have a direct impact on the historic integrity of the lane	
			Brentwood Borough Council Little Hyde Lane, Fryerning (BRWLANE10) is located in Brentwood and to mitigate any loss and disruption the Applicants have included a section on Protected Lanes (Section 7.9) in the LEMP (Revision C- REP2-019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the Code of Construction Practice (Revision B – REP2-015).	The identified protected lane is assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			The Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of the districts using a methodology which included desk-based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts' relevant Strategic Policies. Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity. If a lane failed to score 2 for integrity it did not proceed to the next stage. A score of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)". Lanes may be impacted in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane.	
			Colchester City Council The Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of the districts using a methodology which included desk based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts relevant Strategic Policies. Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity, if a lane fails to score 2 for integrity it did not proceed to the next stage. A score of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)" Where there will be direct physical impact to the lane, for instance through groundworks associated with undergrounding, then the integrity of the lane may be impacted through removal of historic components of the lane such as roadside greens or banks etc. and possible 'improvements' such as kerbing, inspection pits, markers etc. Should the physical works required equate to	The identified protected lanes are assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			moderate improvements or loss of historic fabric then the lane could fail to meet the threshold for historic integrity and not meet the criteria for a Protected Lane. There is one lane in Colchester District where this could occur within an undergrounding section: Crabtree Lane, Little Horkesley (COLLANE24). Further lanes may be impacted to a lesser degree in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane. These include Protected Lanes in Colchester: • Fossetts Lane, Church End (COLLANE 8) and • Fossetts Lane, Church End (COLLANE 9) To mitigate any loss and disruption to the Protected Lanes the Applicants include a section on Protected Lanes (Section 7.9) in the LEMP (Revision C- REP2-019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the Code of Construction Practice (Revision B – REP2-015). Where possible they aim to minimise disruption from physical works and maintain elements of the Protected Lane. Where removal of historic fabric and features is required, this will have a direct impact on the historic integrity of the lane.	
			Thurrock Council No protected lanes within Thurrock appear to be impacted by the proposed development.	Noted.
			Braintree District Council The Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of Braintree District using a methodology which included desk-based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts relevant Strategic Policies. Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity, if a lane fails to score 2 for integrity it did not proceed to the next stage. A score of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)" Where there will be direct physical impact to the lane	Both of the identified protected lanes are assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			then the integrity of the lane may be impacted. Should the physical works required equate to moderate 'improvements' (in highways terms) or loss of historic fabric then the lane could fail to meet the threshold for historic integrity and not meet the criteria for a Protected Lane. Within Braintree District Protected Lanes may be impacted in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane. The Protected Lanes in Braintree where overhead lines are proposed include: BTELANE17 Pole Road, Fairstead and BTELANE18 Fairstead Lodge Road, Fairstead Further details of the lanes and their scores are available in "Braintree District Protected lanes Assessments, July 2013" To mitigate any loss and disruption to the Protected Lanes the Applicants include a section on Protected Lanes (Section 7.9) in the LEMP (Revision C- REP2-019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the Code of Construction Practice (Revision B – REP2-015). Where possible they aim to minimise disruption from physical works and maintain elements of the Protected Lane. Where removal of historic fabric and features is required this will have a direct impact on the historic integrity of the lane.	
			Tendring District Council Protected Lanes TDC considers that two Protected Lanes in the northwest of the district would be adversely affected by the proposed development. These are: 1. Wick Lane Wick Lane lies to the east of the A12 and to the north of Ardleigh Reservoir. Its Protected Lane status is shown by the black line on the Policies Map. The approximate location is indicated by the red arrow, with the precise alignment provided in Appendix A. 2. Little Bromley Road Little Bromley Road is located just south of the proposed temporary and permanent haul roads, immediately west	Wick Lane is shown on **6.11.F3 Environmental Statement Figure 11.3 - Non-Designated Heritage Assets Assessed in the ES Chapter [Revision C]**. The text below will be included in updated versions of **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** which will be submitted at Deadline 5. **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** should have included, after paragraph 3.4.21: The **low value** single track Wick Lane (**3299**) is of evidential and historical value, and it is located partially

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			and southwest of Little Bromley. Its Protected Lane designation is likewise shown by the black line on the Policies Map. The location is again marked by a red arrow, with the exact route shown in Appendix A. There is clear and robust evidence for treating these Protected Lanes as Non Designated Heritage Assets (NDHAs). Both lanes are explicitly referenced in Tendring District Council's adopted Local Plan, where (on page 197) they are identified – via Essex County Council's designation – as having particular historic value or making a significant contribution to the character of the countryside. Their Protected Lane status reflects their importance as surviving historic routeways within the rural landscape. In addition, the Council's Emerging Local Plan (Regulation 18 consultation recently concluded) again confirms their heritage significance: • Page 27 and Page 137 identify Protected Lanes as features preserved for their historic indication of ancient road patterns within the District. • Emerging Policy PPL3 states that the Council "will protect the rural landscape and refuse planning permission for any proposed development which would cause material harm to its character or appearance, including to protected lanes, other rural lanes, bridleways and footpaths." Furthermore, under the heading Non Designated Heritage Assets (page 147), the emerging Local Plan states: "The District benefits from a wealth of non-designated heritage assets that are locally significant and contribute positively to the area's character and distinctiveness. This may be due to their historic, aesthetic, evidential, or communal value, or a combination of these factors. Examples include houses, shops, schools, village halls, churches, protected lanes…" This makes it unmistakably clear that Protected Lanes fall within the Council's own defined examples of NDHAs due to their historic and evidential value. Finally, following the Regulation 18 consultation, the council is not aware of any objections being lodged against the continued designation of Tendring's nine Protected Lanes – two of which would be negatively affected by the Norwich to Tilbury proposals as set out above. Their protection is therefore both well established and currently uncontested within the emerging policy framework.	within the Order Limits between Old Ipswich Road in the west and Wick Farm in the east. **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** should have included, in Table A11.2.12 Construction effects to non-designated heritage assets - Section C: **Construction Impact** The asset (**3299**) is Wick Lane, a Protected Lane, between Old Ipswich Road in the west and Wick Farm in the east. The construction phase would result in the temporary loss of any portion of the asset impacted by groundworks for bellmouth works associated with the crossing of the temporary haul road immediately to the east of pylon TB20 and west of its intersection with Lodge Lane. The asset would also be impacted by UK Power Networks overhead line mitigation. Asset elements such as flanking walls, banks, ditches, hedges, etc. would be reinstated. As a small proportion of the asset falls within the Order Limits' area of impact, the magnitude of impact is considered to be **low adverse**. **Mitigation** Archaeological investigation and recording prior to the construction phase if required. Any physical impact to protected lanes would be reinstated in accordance with the provisions in the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** and the **7.2 Outline Code of Construction Practice [Revision D]**. **Significance of Effect** The value of asset (**3299**) is **low**, and the magnitude of impact prior to mitigation is considered to be **low adverse**. The implementation of the archaeological mitigation would reduce the impact to **negligible**, resulting in a direct, permanent **negligible adverse** significance of effect (**not significant**). **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** should have included in Table A11.2.28 Operational (and maintenance) effects to non-designated heritage assets - Section C: **Operational (and Maintenance) Impact** The asset (**3299**) is Wick Lane, a Protected Lane, between Old Ipswich Road in the west and Wick Farm in the east. All the impacts on asset (**3299**) would take place during the construction phase. From the commencement of the

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				operation phase there would be no more below ground impacts and so no further impacts on asset (**3299**). **Mitigation** N/A **Significance of Effect** N/A Little Bromley Road is outside the 250 m Study Area for non-designated heritage assets.
HE 1.40	South Norfolk DC	**South Norfolk Local impact report** Page 17 of your **LIR [REP1-176]** states that you consider that harm to heritage assets in the District may be greater than identified in some instances for operational impacts. Please confirm which assets you are referring to in this context.	**South Norfolk District Council** These are set out in Paragraph 6.16 of SNDC's Relevant Representation as below. • Church of All Saints, Tibbenham: Moderate adverse significance of effect (significant); mid less than substantial harm; • Church of St Remigius: Moderate adverse significance of effect (significant); Mid less than substantial harm; • Kenningham Hall: Moderate adverse significance of effect (significant); mid less than substantial harm; • Elm Farmhouse: Moderate adverse significance of effect (significant); mid less than substantial harm; • Manor House: Moderate adverse significance of effect (significant); mid less than substantial harm; • Heywood Manor: Moderate adverse significance effect (significant); mid less than substantial harm; • Flordon Hall: Moderate adverse significance of effect (significant); High less than substantial harm; Manor Farmhouse: Minor adverse significance of effect (not significant); Mid less than substantial harm.	The Applicant responded to South Norfolk District Council in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and for the Church of St Remigius comments were also provided in response to Historic England's Written Representation (**8.8.1 Applicant's Comments on Written Representations [REP2-029]**). The Applicant notes that Historic England, in their Written Representation **[REP1-191]**, agree with the conclusions of the assessment for the Church of All Saints (1049992) and Flordon Hall (1050698).
HE 1.41	The applicant Tendring DC	**Tendring Local Impact Report** To Tendring DC: Page 49 of your **LIR [REP1-182]** states in paragraph 15.6 that in Ardleigh certain heritage assets will encounter adverse effects during construction, effects with you consider to be underestimated. The assets include "several Grade II farmsteads". Please confirm which farmsteads you are referring to in this context. Paragraph 15.4 notes that listed cottages adjacent to Little Bromley war memorial are plausibly at risk from vibration. Please confirm which cottages. To the applicant Respond to the specific vibration point for Little Bromley heritage assets.	**Tendring District Council** Grade II Listed Farmsteads Referenced in TDC's LIR (Ardleigh Area) The Grade II listed farmsteads referred to in paragraph 15.6 of Tendring District Council's Local Impact Report are the following heritage assets located along Wick Lane: • Fountain Farmhouse (Grade II) • Wick Farmhouse (Grade II) and Wick Farm Barn (Grade II) • Bloomfields Farmhouse (Grade II) and Bloomfields Farm Barn (Grade II) As set out in detail within TDC's LIR and RR, there will be substantial construction activity in and around Wick Lane, including (but not limited to) significant hedgerow removal, construction and operation of temporary and	The assessment presented in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** concluded: for 'Fountain Farmhouse' (1253912) a minor adverse effect during construction and negligible adverse effect during operation; for 'Wick Farmhouse' (1253913), 'Barn Adjacent to Road at Wick Farm' (1253914), 'Bloomfields Farmhouse' (1253915) and 'Barn Approximately 40 m North East of Bloomfields Farmhouse' (1261548) minor adverse effects during construction and operation. The assessment presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded lower less than substantial harm for construction and operation for all five of these listed buildings.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			permanent haul road crossings, increased construction vehicle movements, and associated landscape and setting alterations. Individually and cumulatively, these works will give rise to adverse construction phase effects on the setting and significance of the listed farmsteads, or – at the very least – effects which TDC considers to be underestimated in the Applicant's assessment. Cottages Adjacent to Little Bromley War Memorial (Paragraph 15.4) The cottages referred to in paragraph 15.4 of TDC's LIR are the two Grade II listed cottages located on the east side of Bentley Road, positioned: • Immediately south of The Haywain Public House, and • Approximately 200 metres south of the Little Bromley War Memorial These cottages lie within close proximity to construction activities, including HGV routing and haul road works, and are therefore, in TDC's view, plausibly at risk from construction related vibration impacts. The precise locations of these cottages and farmsteads are shown in Appendix A.	The assessment has considered the contribution of the setting of each asset to their values as well as the group value between 'Wick Farmhouse' (1253913) and 'Barn Adjacent to Road at Wick Farm' (1253914) and between 'Bloomfields Farmhouse' (1253915) and 'Barn Approximately 40 m North East of Bloomfields Farmhouse' (1261548) (**6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]**). As the Project would not cause any physical impact to any of these listed buildings, would not affect the group value of the farmhouses with their respective barns and would cause change within only some aspects of their settings that contribute to their value the conclusions of the assessment are considered to be appropriate. The Applicant responded regarding potential for vibration impacts to listed buildings in response to ExQ1 HE 1.11 and, specifically in relation to 'Pair of Cottages Approximately 10 Metres South of The Fox and Hounds Public House' (1111418), in HE 1.41 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

10. Health and wellbeing

Table 10.1 Health and wellbeing

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
HW 1.1	The applicant	**Time periods' effect on health and wellbeing** ES chapter 10 **[APP-192]** at paragraph 10.7.31 in relation to residual effects during construction in respect of landscape and townscape it is concluded that the magnitude of effect is low because construction activities are likely to be short term. It is stated this is 4 years but intermittent. What evidence is there to suggest an impact over 4 years would be less impactful on mental health and wellbeing? The stress over what would appear a significant period of time could potentially be impactful and the intermittency may indeed add to that if it is not time limited in short discreet time periods and then does not return. Explain your reasoning for this conclusion and add detail around what you mean by intermittent.	**Holton St Mary Parish Council** *[*note: this submission is stated by HSM PC to also relate to HW 1.10 and HW1.13 but is not repeated for ease of reference]*. Parish Council would like to draw the Inspectorate's attention to the cumulative impacts on the general disruption and the residents' health, wellbeing and level of anxiety. We refer to: Picture 1 - showing of the road and PoW closures proposed to the West of the village;. Picture 2 – below – showing the disruption to residents North of the village due to proposed new access road, with its scheduled 500 plus HGV movements per day. And Picture 3 – below - showing the disruption to residents in the East and at the A12/B1070 junction and slip road proposals. Residents of the village are already expressing their distress at the proposed disruption to their lives, their children's lives, journeys to work, access to families, emergency access etc. road closures, excessive noise, vibration, dust, light pollution seven days a week for 10-12 hours a day, including bank holidays, is already causing severe anxiety for many. Not knowing exactly when this will start, how long it will continue and how they will be able to plan their lives for a duration of four years or more is very challenging. The works will adversely affect resident's ability to sell their homes, adding to the stress. Cumulative impacts on residents' health and wellbeing must be assessed and sufficiently mitigated	The Applicant has noted that stress and anxiety associated with construction of the Project would potentially have an impact on mental health and wellbeing for residents. The Applicant's response to HW 1.9 in **8.9.1 Applicant's Responses to First Written Questions [AS-090]** has highlighted the role of communication and community liaison during the construction period, adding new wording to **7.2 Outline Code of Construction Practice [Revision D]** as follows: *'The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice and will include how we will engage with seldom heard and hard-to-reach groups, including those with linguistic vulnerabilities. The Applicant will liaise with Local Planning Authorities ahead of construction to agree timescales and implementation'.*
HW 1.8	The applicant Brentwood BC	**Brentwood Borough Council's local impact report – protected characteristics and complex sensory needs** Paragraph 6.45 of **Brentwood Borough Council's Local Impact Report [REP1-150]** notes it "…has received representations indicating that some households within the Haverings Grove and Rayleigh Road corridor include individuals with protected characteristics and complex sensory needs, where noise, vibration, unexpected traffic conditions and sudden acoustic stimuli can cause acute distress. These households report that prolonged construction activity, including extended working hours and associated traffic behaviours, would disproportionately affect their wellbeing and daily functioning. Given the Public Sector	**Brentwood Borough Council** BBC can confirm that it has received representations from households with individuals with protected characteristics as per the Equalities Act 2010 and also with complex sensory needs. BBC understands that written representations have also been made directly to the ExA from the same household, which has offered to provide further details on a confidential basis and has requested meaningful discussion with NG about the range of mitigation it would be able to offer to reduce harmful impacts. In light of the above and given the confidential nature of the required details, BBC is unable to expand upon the targeted measures to minimise disturbance, but would	This is noted and the Applicant can confirm that further arrangements are being made to undertake discussions with the relevant household to understand concerns, explain potential impact and understand opportunities for additional mitigation if appropriate. The Applicant notes that Brentwood Borough Council remains available to facilitate and/or participate in these discussions as required and will ensure the council is kept updated in this matter.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Equality Duty, [the Council] …considers that vulnerable residents in this locality warrant particular regard within the DCO's mitigation framework, including the need for targeted measures to minimise disturbance." For the applicant, to what extent have you had regard to individuals with protected characteristics in considering health and wellbeing, stress and anxiety? Explain how this has been considered and detail where this is explained. What additional measures have you sought to employ to minimise disturbance on individuals with protected characteristics and complex sensory needs and what further measures can be employed? For Brentwood Borough Council, what are the targeted measures to minimise disturbance, you reference that you are seeking from the applicant?	urge NG and the ExA to engage with the relevant household (as per their independent representation) to understand what these might be and how they can be agreed and secured. BBC remains available to facilitate and/or participate in these discussions as required.	
HW 1.12	The applicant	**Essex CC's local impact report – mitigation and other benefits** Essex CC seeks various mitigation and other benefits including in relation to skills and training, community benefits fund that invests in community benefits active travel support for mental health resilience and village enhancements. Without such additional mitigation Essex CC considers several health impacts should be reviewed to ensure there is not an underestimation or unassessed impacts. Explain what benefits the applicant is committed to provide and how this is secured including whether there will be a community benefit fund and how that would operate. If the applicant does not intend to secure any of these commitments explain and justify why they are not necessary. See question HW 1.11 above and HW 1.13 and HW 1.14 below.	**Chelmsford City Council** CC welcomes the mitigation and other benefits.	Chelmsford City Council's response is noted. In the response to question HW 1.12 in **8.9.1 Applicant's Responses to First Written Questions [AS-090]**, the Applicant has set out further information relating to the approach to community funds, including proposed next steps. The Applicant will continue to engage with Local Planning Authorities and communities as part of this process.

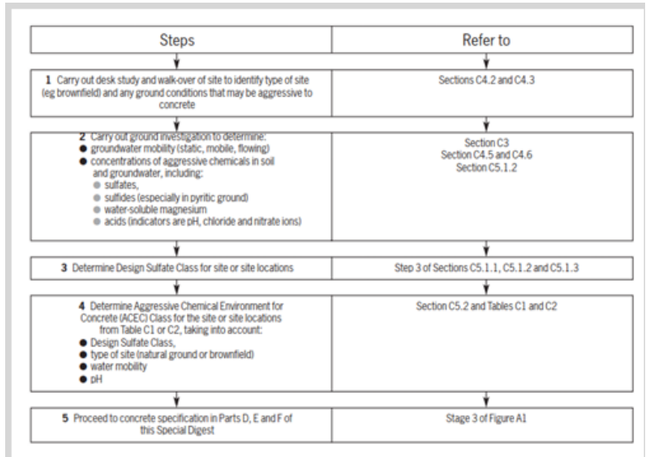
11. Land use and soils green infrastructure

Table 11.1 Land use and soils green infrastructure

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
LUS 1.2	The applicant Natural England Pylons East Anglia Limited All local authorities	**Best and most versatile agricultural land (BMV) and soils -** 1 It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soil in document 8.4.6 page 22 that 'the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas'. As being a representative conclusion that can be applied across the whole Order Limits as they are not all 'surveyed areas'.	**Essex County Council** ECC refers to the relevant district authorities for a response on this matter although notes the references made in their respective LIRs regarding the overreliance on predictive modelling across the Order Limits, which would likely reduce the level of confidence can be placed on the applicants response on acid soils	These points are addressed in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant's comments on responses by district authorities, where they have responded, are provided below.
			Chelmsford City Council CCC defer to Natural England. CCC is aware that they have a relevant team with regard to soil management and resourcing.	The Applicant will review the response from Natural England once submitted and may comment at Deadline 5.
			Natural England We are seeking the advice of soil specialists who have not been able to respond in the time allowed. We hope to provide an update on this question at deadline 4.	
			Norfolk County Council NCC defers to South Norfolk District Council on soil matters.	It is noted that SNDC have no comments to make on this subject.
			South Norfolk District Council SNDC have no comment to make.	
			Colchester City Council CCC understand that it is not a usual requirement of the ALC survey to look for jarosite within the soil, and therefore less experienced surveyors may not detect its presence. Without soil analysis of these soils where they were not identified as being calcareous, there is no other information obtained during the ALC survey that would conclusively determine whether the soils are not acid sulphate soils. A preliminary risk assessment should have picked up the likelihood of these soils being present, and where they have been identified further testing should be carried out. Additionally, given that only 54% of the survey area was subject to the ALC, it cannot be held to be conclusive.	These points are addressed in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. As stated in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [REP1-062]**, the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the ALC Revised Guidelines[8] by competent soil scientists following the British Society of Soil Science Professional Competency in Soil Science[9]. A preliminary desk-based assessment, utilising information from Soil Alert 1: Acid Sulphate Peats and

[8] Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification of England and Wales – Revised Guidelines and Criteria for Grading the Quality of Agricultural Land

[9] British Society of Soil Science (2021) Professional Competency in Soil Science No.2 - Agricultural Land Classification - England and Wales

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Braintree District Council **Tendring District Council** **Babergh and Mid Suffolk District Council** The ALC survey would not directly assess for acid sulphate soils, therefore there is no way of accurately determining whether acid sulphate soils are present using ALC data alone. A response from the Applicant has indicated that the surveyor would be looking for jarosite within the soil, however this would not be a usual requirement of the survey, and this may not be picked up by less experienced surveyors. The response has also indicated that "some" of the soils within the areas identified as being a potential for containing acid sulphate soils were calcareous. Without soil analysis of these soils where they were not identified as being calcareous, there is no other information obtained during the ALC survey that would conclusively determine whether acid sulphate soils are absent. The Council's soil specialist concludes that the ALC data collected is not robust enough to identify whether acid sulphate soils are present or not. A preliminary risk assessment should have picked up the likelihood of these soils being present, and where they have been identified further testing should be carried out. The requirements of this are listed within BRE SD1:2005.  **Suffolk County Council** SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to soils.	Alluvium (available on the LandIS website[10]), identified that within the Order Limits, only the Wallasea 1 and Mendham soil associations are present. The Mendham soil association is only present across and near to the Waveney Valley; and the Wallasea 1 soil association is only present within the Agriculture and Soils Study Area near Tilbury and is not identified within the Order Limits, as shown on **6.6.F6 Environmental Statement Figure 6.6 - Soil Association Map [APP-146]**. Therefore, the potential for these materials to be encountered is limited. Additional surveys were undertaken on a 50 m grid in the Waveney Valley between auger bores 305-309 to further investigate peat extent and the potential presence of acid sulphate soils. The survey used an extended Dutch auger, enabling sampling to depths of up to 2.0 m. The peat survey confirmed the presence of peat and loamy peat, consistent with the results of the ALC survey. The survey did not identify the presence of jarosite within the soil profile, including in locations where desk-based information suggested a potential risk of acid sulphate soils. The survey further found that the peat and loamy peat are predominantly underlain by calcareous loamy sand, confirmed by reaction with 10% hydrochloric acid. As such, there is no evidence to indicate the presence of actual acid sulphate soils within the surveyed areas from field survey and no further specific laboratory testing was therefore undertaken. However, it is accepted that this does not fully rule out the potential for acid sulphate soils to occur locally, as such acidic sulphate soils can be sporadic in distribution. Should any evidence of acid sulphate soils arise during construction, appropriate investigation (based on the BRE SD1:2005[11] requirements (covered by commitments GH02 and GH08 in **7.2 Outline Code of Construction Practice [Revision D]**)) and mitigation measures would be implemented in accordance with good practice. Investigative measures to identify acid sulphate soils will be defined in the final Soil Management Plan, and in areas such as the Waveney Valley, where potential acid sulphate soils may be encountered, the Soil Scientist will be onsite to oversee works and provide guidance on the identification of acidic materials. Any occurrences encountered during construction would be managed as required by **7.2 Outline Code of Construction Practice [Revision D]** (commitments GH02 and GH08) to include activities such as toolbox talks, isolation of areas and treatment/off-site disposal of acidic materials.

[10] LandIS (2026) Soil Alert 1: Acid Sulphate Peats and Alluvium

[11] BRE (2005) Concrete in Aggressive Ground (SD1)

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LUS 1.4	Natural England All local authorities Pylons East Anglia Limited	**BMV and soils - 3** To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.	**Essex County Council** ECC refers to the relevant authorities for a response on this matter.	The Applicant's comments on responses by district authorities, where they have responded, are provided below.
			Natural England We are seeking the advice of soil specialists who have not been able to respond in the time allowed. We hope to provide an update on this question at deadline 4.	The Applicant will review the response from Natural England once submitted and may comment at Deadline 5.
			Chelmsford City Council CCC defer to Natural England. CCC is aware that they have a relevant team with regard to soil management and resourcing.	
			Norfolk County Council NCC defers to South Norfolk District Council on soil matters.	South Norfolk District Council has not made a comment.
			South Norfolk District Council SNDC have no comment to make	
			Colchester City Council The inclusion of GH01 more so than GH02 could ensure that further testing of identified soils that pose that risk as being acid sulphate soils is carried out, but only if the BRE SD1:2005 is followed as part of the ground investigations.	Should any evidence of acid sulphate soils arise during construction, appropriate investigation (based on the BRE SD1:2005[11] requirements) and mitigation measures would be implemented in accordance with good practice and the requirements of **7.2 Outline Code of Construction Practice [Revision D]**, specifically measure GH08, which provides protocol to deal with unexpected contamination. To ensure the aspects of potentially acid sulphate soils are specifically set out, the final Soil Resources Plan will include a section detailing the measures which will be put in place based on the locations and depths of actual works so that any investigations and supervision can be targeted. Acid sulphate soils could be identified as unexpected contamination, triggering investigation and response. Toolbox talks on acid sulphate soils will be developed by the Soil Scientist to ensure the Main Works Contractor(s) are aware of the risks and identification methods. In areas such as the Waveney Valley, where potential acid sulphate soils may be encountered, the Soil Scientist will be onsite to oversee works and provide guidance on the identification and isolation of affected areas and appropriate treatment or off-site disposal of acidic materials. This approach ensures proactive risk management, specialist oversight, and compliance with industry best practice to minimise potential harm to human health and ecosystems. Commitment GH02 in **7.2 Outline Code of Construction Practice [Revision D]** secures the requirement for a
			Braintree District Council **Tendring District Council** **Babergh and Mid Suffolk District Council** The inclusion of GH01 more so than GH02 could ensure that further testing of identified soils that pose that risk as being acid sulphate soils is carried out, but only if the BRE SD1:2005 is followed as part of the ground investigations.	
			Suffolk County Council SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to soils.	

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				Foundation Works Risk Assessment to be undertaken where piled foundations are anticipated, and was not intended for acid sulphate soils. However, GH01 secures the requirement for intrusive ground investigation prior to construction to inform appropriate geoenvironmental assessment and geotechnical design. GH08 secures the requirement for an unexpected contamination protocol to be developed which would include details of watching briefs and toolbox talks, preparation of method statements, development of an escalation policy and details of any verification procedures.
LUS 1.8	The applicant Suffolk CC	**BMV and soils - 7** Suffolk CC's **Joint LIR [REP1-178]**, at paragraph 5.30 notes that BMV land would require reinstatement to the same or greater soil quality. Appropriate mitigation for severed or sterilised remaining land is necessary. Field drainage systems should be replaced as required after construction and decommissioning. • Suffolk CC: confirm if the mechanisms in the draft DCO and other control documents provide them with the assurance that these matters are adequately secured, if not explain what other specific measures would be required and how these can be secured. • The applicant: comment on whether these matters are secured in the draft DCO and signpost where or whether further commitments are to be introduced to address the matters.	**Suffolk County Council** SCC notes that AS02 of the oCoCP **[REP2-014]** is satisfactory in relation to soil quality, however, the Council seeks further certainty regarding the mitigation for affected land drainage as detailed in AS05 of the oCoCP. There does not appear to be any provision within the management plans for mitigation or compensation of operational agricultural land that would be severed or sterilised as a result or either construction or operation of the development. The Council requests further information in this regard. Provided that information is contained within the final management plans then the Council considers that Requirement 4 would be sufficient to secure the appropriate mitigation or compensation.	The Applicant welcomes that SCC notes AS02 of **7.2 Outline Code of Construction Practice [Revision D]** is satisfactory in relation to soil quality. Temporary disruption to field drainage systems disturbed during construction will be addressed by their reinstatement to no worse than their former condition, and any installed pre-construction land drainage to replace existing land drains affected by permanent infrastructure, as well as any drainage improvements resulting from the Project, would be retained (commitment AS05 within **7.2 Outline Code of Construction Practice [Revision D]**, secured by Requirement 4 of **3.1 Draft Development Consent Order [Revision D]**). Commitment AS03 within **7.2 Outline Code of Construction Practice [Revision D]** requires that, where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction period or as agreed through the landowner discussions. This may require signed diversions or temporary restrictions to access. The means of access to affected properties, facilities and land parcels will be communicated to affected parties at the start of the Project / at the start of the relevant sections, with any changes communicated in advance of the change being implemented. Where field-to-field access points require alteration because of construction, alternative field access will be provided in consultation with the landowner/occupier. In addition, **6.6 Environmental Statement Chapter 6 – Agriculture and Soils [APP-138]** notes that these measures would be in combination with compensation agreements where required.
LUS 1.12	Chelmsford CC Brentwood BC Basildon BC Thurrock Council	**Green Belt - 3** Comment on the applicant's position with regard to lines and pylons being not inappropriate development in the Green Belt and whether you disagree with the proposition and why.	**Chelmsford City Council** CCC disagrees with the Applicants position that the lines are pylons are not inappropriate within the Green Belt. In its Planning Statement, the Applicant makes the case that the proposed overhead lines (both new and existing	The Applicant provided a comprehensive response to the matter of whether the OHLs are "inappropriate development" and the application of relevant policy on Green Belt to the Project in responding to ExQ1 Written Questions LUS1.10 and LUS1.11 set out in **8.9.1**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			as modified and reconductored) would comprise an engineering operation which benefits from the exception in NPPF para 154, meaning that the works would not constitute inappropriate development in the sense of NPPF para 153. CCC considers that the overhead lines and pylons comprise structures that do not fall within the categories listed within para 153. Therefore, they are inappropriate development which is harmful by definition and Very Special Circumstances (VSC) will be needed to clearly outweigh the harm by definition and any other harm identified. In Chelmsford, there would be approximately 32 pylons sited within the Green Belt which is not insignificant. As stated within CCC's Local Impact Report (REP1-153), from a spatial element, the Project would introduce substantial development into the area in terms of ground cover and built form that would diminish the openness of the Green Belt spatially. The proposed new pylons would introduce very sizeable new structures into the landscape. Whilst the steel lattice design of the pylons would allow views through the structures, their presence collectively and in linear layout would nonetheless result in prominent new features in the landscape. Visually, the landscapes that would be affected by the Project are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale and height of the pylons and overhead wires mean the effect is an industrialisation of the countryside. Even where existing landscape features or proposed planting may be capable of reducing the effect on Green Belt openness from a visual perspective, CCC considers there can be no doubt that by their very presence, the considerable number of new pylons would have a substantial spatial effect which would undermine openness. The Project would conflict with the purposes of including land within the Green Belt. In terms of encroachment, the Project would place a large number of pylons (32) and associated infrastructure within an extensive number of fields within the countryside. Although maintaining some separation between them, the pylons and associated infrastructure would fundamentally alter the appearance of the fields and landscape that they would be sited	**Applicant's Responses to First Written Questions [REP3-074]**. The position is summarised below. . By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. As pylons are spaced up to approximately 360 m apart, the perception of openness is maintained as one is able to 'see through' the widely spaced pylons and conductors to whatever is beyond. The Applicant has concluded that the pylons and overhead line works do not conflict with Green Belt purposes and preserve openness and as such, benefit from exception h) ii in paragraph 154 of the National Planning Policy Framework[12] (NPPF). The Applicant has set out this position within **5.6 Planning Statement [APP-085]**, **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and in response to Written Questions LUS 1.10 and LUS 1.11 set out in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. As noted by Chelmsford City Council in their submission (and the Applicant's responses to LUS 1.10), the ExA for the Yorkshire GREEN (and Hinkley C Connection Project) application for development consent concluded that the new overhead line proposed within the York Green Belt was an engineering operation. It was concluded by the ExA that there would be an adverse effect on Green Belt openness and as a consequence those proposals were considered to be inappropriate development in the Green Belt. Where inappropriate development is proposed within the Green Belt, very special circumstances would be required to justify their acceptability. Whilst the Applicant maintains that the overhead line and pylons is not inappropriate development within the Green Belt, it has identified the very special circumstances to justify inappropriate development in the Green Belt which include the following: • UK Government policy requires significant reinforcement of the transmission system to facilitate

[12] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

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			within it. These would alter from a sequence of open green spaces to spaces accommodating large, industrialised development that would result in encroachment, in contradiction of a Green Belt purpose. There would be adverse effects on openness as a result of the temporary construction works associated with the Proposed Development. The Project would have an adverse effect on Green Belt openness and would conflict with the purpose of the Green Belt to safeguard the countryside from encroachment.. As a consequence, the Proposed Development would be inappropriate development in the London Green Belt. Inappropriate development is, by definition, harmful to the Green Belt. In accordance with NPS EN-1 and the NPPF, inappropriate development should not be approved except in very special circumstances. This approach was taken with regard to the consideration of the Yorkshire Green pylon proposal EN020024 which confirmed that the presence of overhead lines and pylons comprised inappropriate development. **Thurrock Council** The Council disagree with the Applicant's position with regard to pylons and overhead lines being not inappropriate development in the Green Belt. The Council consider that the pylons and overhead lines are structures, which do not fall within any of the exemption categories set out in paragraph 154 of the National Planning Policy Framework. Therefore, the Council considers them to be inappropriate development in the Green Belt, which is harmful by definition, and very special circumstances will need to be demonstrated for the project to proceed. The structures are considered to have both a spatial and visual element which would result in a loss of the openness of the Green Belt. New structures, pylons 45-50m tall, would be introduced into some Green Belt areas where none exist at present, whilst in other Green Belt areas of the borough, additional pylons and overhead lines will increase the amount of structures located in the Green Belt; both of these actions would result in the development having a greater impact on the Green Belt than exists at present. The routing would reduce the spatial and visual openness of the Green Belt across a significant area of the borough.	the connection of renewable energy sources to transport electricity to where it is used • The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term • New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected in East Anglia by 2030. These connections are being constructed or are expected to connect to substations at Necton, Norwich Main, Bramford, Friston and Sizewell • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required • The requirement to replace the fossil fuels that once powered the economy, with low-carbon electricity to meet net zero by 2050 • By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030 • Clean Power 2030[13] states that '*Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030*.' Norwich to Tilbury comprises two of the three projects. The critical and urgent nature of the Project is recognised in the strongest terms as advancing achievement of Clean Power 2030 objectives

[13] National Energy System Operator (2024) Clean Power 2030

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Basildon Council We disagree with this proposition. The National Planning Policy Framework (NPPF) and Essex GI Strategy stress the importance of quality and function, not just quantity of green infrastructure. The presence of lines and pylons as proposed by the Applicant in the Green Belt by definition inhibits this. *[Applicant note: the Applicant has identified that the second part of this response as submitted by BBC below relates to GEN 1.23 and appears to be provided under LUS 1.12 in error. Whilst provided below for completeness, it is not responded to here and is instead provided and responded to by the Applicant at GEN1.23 of this document]* We welcome the provision by the Applicant as requested by GEN 1.23 of the provision of the "clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.". We believe that this will illustrate the degree of impact that will be caused. Holford Rule 7 states that "When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development" this has been quoted elsewhere in answer to GEN 1.24, evidence being sought of a hierarchy of mitigation approach. This approach appears to be at odds with the Applicant's position.	Whilst the need case justifies the Project's very special circumstances, the position as set out in NPS EN-1 (2024), is that Critical National Priority (CNP) Infrastructure, subject to the application of the mitigation hierarchy, meets the test in relation to requiring very special circumstances to justify development, and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '…*the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: Where development within a Green Belt requires very special circumstances to justify development* […]'.
LUS 1.14	All local authorities	**Green infrastructure and open space - 1** Appendices B1, B2 and B3 to the applicant's Planning Statement [APP-085] contain tables and assessment of the projects impact on open spaces. Do the host local authorities agree with the assessment and conclusions reached in table B.1, if not explain your reasoning and justification for your conclusions. Do Colchester City Council agree with the conclusions and assessment of fishing provision within Ardleigh and if not explain your reasoning and justification. Do Thurrock Council agree with the applicant's assessment of the impacts of pylons in Maple Park and if not explain your reasoning and justification.	**Essex County Council** ECC recognises that the Applicant has undertaken a comprehensive desk-based and field-informed assessment, and that many impacts are temporary and capable of reinstatement. While much of the route avoids major open spaces, ECC does not fully agree with several of the conclusions presented. 1. Green Infrastructure (GI) and Nature Recovery Many of the open spaces along the route, whether public or private, form part of Essex's wider Green Infrastructure (GI) network, which supports wildlife, habitats, flood management, climate resilience and community wellbeing. ECC's position is supported by the Essex GI Strategy and Essex Local Nature Recovery Strategy (LNRS), which emphasises the importance of protecting and	The Applicant welcomes the feedback from Essex County Council regarding the comprehensive nature of the open space assessment. The council's comments are noted and each point made is responded to in turn below in relation to the Open Space Assessment, which is set out in Appendix B of **5.6 Planning Statement [APP-085]**. 1. Green Infrastructure (GI) and Nature Recovery The Applicant would note that many of the sites included within the open space assessment are not publicly accessible. The Project has taken a precautionary approach to include all land and water bodies that could be considered to be open space in the list of potential sites. The exercise included identifying whether any land contained allotments, cemeteries, common land, golf courses, Accessible Natural Green Space, amenity land,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			enhancing GI networks, not just designated parks or recreation sites. The applicant's assessment mainly focuses on: • whether land is publicly accessible, or • whether a numerical "surplus" of open space exists. Even small or privately owned areas may play an important ecological role. This is also a requirement of the National Planning Policy Framework (NPPF), which makes clear that planning decisions should protect and enhance green infrastructure, biodiversity and ecological networks not just formal open spaces. 2. Alignment Several areas affected by the project are located within the Essex LNRS Strategic Opportunity and potential opportunity zones. The applicant's assessment does not fully acknowledge these LNRS considerations, meaning the value of certain open spaces has been understated. 3. Areas • Maple Park & Buckingham Hill (Thurrock) - Two pylons and access works will reduce the function of a key green corridor already under pressure from other major infrastructure. Despite claims of "surplus" open space, the NPPF and Essex GI Strategy stress the importance of quality and function, not just quantity. This will be subject to confirmation by Thurrock Council • Ardleigh Reservoir & Fishing Lakes - Parts of these sites will no longer be usable for angling due to safety exclusion zones. While other fishing locations exist, these lakes are also important wetland habitats and stepping-stones within the LNRS ecological network. This will be subject to confirmation by Thurrock Council • Woodland Edges & Wildlife Sites - Even where land is not publicly accessible, it can provide essential buffer zones, habitat connectivity, and biodiversity value, all recognised in the LNRS and NPPF. 4. Biodiversity Net Gain (BNG) The project commits to achieving at least 10% Biodiversity Net Gain, which ECC supports. However, the open space assessment does not clearly explain how BNG will: • address the impacts identified, • support LNRS priorities, or • strengthen GI connectivity across Essex.	parks, sports pitches, recreation grounds and fishing lakes, consistent with NPS EN-1 guidance. The methodology for the Applicant's Open Space Assessment, including the justification for site selection, is set out in sections 7.3.432 and 7.3.433 of **5.6 Planning Statement [APP-085]**. A highly precautionary approach was taken to site selection, which resulted in a number of sites being identified where no recreational use exists. Paragraph 5.11.10 of NPS EN-1 requires that an assessment of provision of open space should be made where a loss of open space is proposed, which is why numerical surpluses have been considered. Purchasing biodiversity units off-site would deliver the wider societal and community benefits that the council is seeking. Dependent on where the units are located, the newly created or enhanced habitats may also contribute to climate resilience, flood management and community wellbeing, as well as assisting with nature recovery. Given the large number of units that would be purchased this would make a significant contribution to green infrastructure. 2. Alignment The Applicant has sought to avoid direct impacts to habitats and features of ecological value. Habitats that are temporarily removed by the Project would be reinstated. New habitats would be created in the Environmental Areas to mitigate for landscape impacts. This habitat creation has been designed with the Local Nature Recovery Strategy (LNRS) in mind and integrated into habitats and features that surround these areas. Within the Order Limits new habitats would only be created within the Environmental Areas and it is not proposed to create new habitats elsewhere within the Order Limits. New ecological networks would not be created by the Project; those temporarily removed would be replaced on completion of construction. Purchasing biodiversity units off-site would deliver green infrastructure, contributing to nature recovery and it is likely that schemes would be chosen that align with the LNRS. 3. Areas The Applicant notes the impact on Maple Park and Buckingham Hill (site ref. OS/105), Ardleigh Reservoir (site ref. OS/47) and the Fishing Lake north of Colchester Road (site ref. OS/46) within the Open Space

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			ECC will seek improvements to ensure BNG delivery aligns with both the Essex LNRS and Essex GI Strategy.	Assessment presented in Appendix B of **5.6 Planning Statement [APP-085]**. The purpose of the Open Space Assessment is to consider the impact of the Project on land that falls within the definition of open space, as set out in NPS EN-1. As set out in the Open Space Assessment methodology, a highly precautionary approach has been taken to site selection, and this has included green and blue infrastructure. The impacts on the three fishing lakes at Ardleigh and Maple Park are covered further in response to Tendring District Council and Thurrock Council, below. 4. Biodiversity Net Gain (BNG) The Open Space Assessment, set out in Appendix B of **5.6 Planning Statement [APP-085]** responds to the requirements of NPS EN-1 in respect of open space. This does not seek to duplicate work completed in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. This chapter sets out the Project's approach to Biodiversity Net Gain, with habitats that are temporarily impacted replaced with new planting, some habitat enhancement within retained hedgerows and watercourses, new habitats created in Environmental Areas to achieve no net loss to biodiversity, and BNG delivered by purchasing units off-site. The new habitat that would be created within the Environmental Areas, has been influenced by the LNRS with links to existing green infrastructure beyond the boundaries of the Order Limits.
			Chelmsford City Council In principle CCC raises no objection to the assessments and conclusions relating to Green Infrastructure and open space. These are listed as OS/64 – OS/85. However, it has the following comments to make: • OS/64 – River Ter & Woodland north of Goodmans Lane – Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological monitoring / mitigation to apply. • OS/65 – Lowleys Farm Meadow and River Ter - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological monitoring / mitigation to apply • OS/66 – Lyonshall Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further	The comments from Chelmsford City Council are noted. Habitats that are temporarily removed by the Project would be reinstated. In locations where replacement standard tree planting is unsuitable due to the new overhead lines and underground cables, low height and shallow-rooted tree and scrub species will be included as alternative planting. As set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, this planting would be managed and monitored for five years to ensure that it has established and is growing. Thereafter, the maintenance and management of this planting would revert to the landowner. All trees that would be removed would be replaced on a 3-to-1 basis, i.e., for every tree removed by the Project, three are to be planted. Primarily, comments relate to Project-wide ecological mitigation. Details on mitigation are set out where applicable within the Open Space Assessment as set out in Appendix B of **5.6 Planning Statement [APP-085]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/67 – Stonage Wood – Acceptable buffer zones should apply and ecological monitoring / management to take place. • OS/68 – Sheepcotes Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS69 – Langleys Deer Park – Extensive comments have been made within the LIR (REP – 153), pages 35 and 39 and paragraphs 8.45, 8.60-08.61 regarding the heritage, ecological and arboricultural implications. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Deer Park. • OS/70 – Sparrowhawk Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. • OS/71 – Bedford Playing Fields – Should the siting of the proposal change, such that interaction occurs, CCC expects further consideration of the matter and mitigation to be applied. • OS/72 – Border Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. • OS/73 – Bushy Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/74 – Scout Jamboree Site – CCC disagrees with national Grids view that the project would limit the Scout Jamboree from taking place on this site. See CCC's LIR (REP-153) page 100, paragraph 8.490. Permanent effects on the site should be considered and mitigated as appropriate to ensure that the	The Project's proposed approach to ecological mitigation is set out in full at Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. OS/64 – River Ter & Woodland north of Goodmans Lane: Neither the river or woodland have been identified as ecological receptors in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The implementation of standard mitigation measures delivered through **7.2 Outline Code of Construction Practice [Revision D]** would ensure that water quality is protected. Three trees would be planted for every tree removed by the Project, as identified in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. OS/65 – Lowleys Farm Meadow and River Ter As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct impacts to Lowley's Farm Meadow Local Wildlife Site and the implementation of the measures in **7.2 Outline Code of Construction Practice [Revision D]** would ensure no hydrological impacts. OS/66 – Lyonshall Wood Lyonshall Wood is outside the Order Limits. There would be no direct or indirect ecological effects on this woodland. OS/67 – Stonage Wood Stonage Wood is 18 m from the Order Limits. There would be no direct or indirect ecological effects on this woodland. OS/68 – Sheepcotes Wood As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect impacts to Sheepcotes Wood. OS/69 – Langley Deer Park As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be minor impacts to trees <0.0001 ha within Langley's Deer Park Local Wildlife Site. Because of electrical clearances, no pylons would be located within the Local Wildlife Site.

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			Jamboree can continue to take place unhindered by the Project. • OS/75 - Reclaimed Landfill Park, Chignall St James (Former Roxwell Quarry Restoration Site) and River Can – appropriate mitigation should be applied to ensure that the proposed haul road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. • OS/76 – Roxwell Road and Writtle Brook - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. • OS/77 – Tutney Pond - Should the siting of the proposal change, such that interaction occurs, CCC expects further consideration of the matter and mitigation to be applied. • OS/78 – Lady Grove - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/79 – Great / Little Edney Woods - appropriate mitigation should be applied to ensure that the proposed haul road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. • OS/80 – Writtle Park Wood – CCC welcomes the additional planting of this site. • OS/81 – James' Spring - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/82 – Handley Green - appropriate mitigation should be applied to ensure that the proposed haul/access road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.	Comments are made with regard to the heritage impacts to Langleys Deer Park (OS/69). The impacts on this Registered Park and Garden are considered within **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** and associated appendices. This sets out that lower height pylons will be used in the area surrounding Langleys Deer Park, to reduce impact. These impacts are considered to be outside the scope of the Open Space Assessment. OS/70 – Sparrowhawk Wood As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect ecological effects on this woodland. OS/71 – Bedford Playing Fields The Project has been designed specifically so as to avoid any direct interaction with these sports pitches. They are located outside the Order Limits, and no development will take place on it. OS/72 – Border Wood As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect ecological effects on this woodland. OS/73 – Bushy Wood As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect ecological effects on this woodland. OS/74 – Scout Jamboree Site Engagement between the Applicant and representatives of the Jamboree has been ongoing since non-statutory consultation in spring 2022 and has included multiple meetings, a site visit during the 2024 event attended by the Applicant's Land Rights Project Manager and design engineers, and continued dialogue regarding the operational requirements of hosting a large international youth event. The Applicant remains committed to continued engagement with the Essex International Scouts and Guides Jamboree with the aim of resolving outstanding matters where reasonably practicable and progressing the Statement of Common Ground (**8.3.7 Draft Statement of Common Ground - Essex International**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• OS/83 – Bushey Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/84 – Osbournes Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood. • OS/85 – Stock Brook - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. Effects on the watercourse should be mitigated.	**Jamboree [REP1-078]**) as discussions continue. Further engagement will take place as the Project programme progresses to determine how the event could be accommodated, taking into account the proposed phasing of the Project Potential mitigation could include a limitation on construction activities e.g. use of the haul road whilst the Jamboree is being set-up, in operation and demobilised. As an alternative position, the Applicant is also supporting the Essex International Jamboree find an alternative site. OS/75 - Reclaimed Landfill Park, Chignall St James (Former Roxwell Quarry Restoration Site) and River Can The implementation of standard mitigation measures delivered through **7.2 Outline Code of Construction Practice [Revision D]** would ensure that water quality is protected. Three trees would be planted for every tree removed by the Project, as identified in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. OS/76 – Roxwell Road and Writtle Brook The implementation of standard mitigation measures delivered through **7.2 Outline Code of Construction Practice [Revision D]** would ensure that water quality is protected. Three trees would be planted for every tree removed by the Project, as identified in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. OS/77 – Tutney Pond Tutney Pond is located outside the Order Limits, and no development will take place on it. Therefore, there will be no direct or indirect impact on it and consideration of whether this land is surplus to requirements, is not required. OS/78 – Lady Grove With the application of the mitigation measures outlined in **8.10.1 Ancient Woodland Technical Note - Part 2 [REP3-059]** there would be no ecological impacts to Lady Grove. OS/79 – Great / Little Edney Woods With the application of the mitigation measures outlined in **8.10.1 Ancient Woodland Technical Note - Part 2 [REP3-059]** there would be no ecological impacts to Great / Little Edney Woods.

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				OS/81 – James' Spring As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect ecological effects on this woodland. OS/82 – Handley Green This woodland has not been identified as an ecological receptor in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. It will be necessary to cut back tall trees and shrubs for electrical clearance where the 400 kV line oversails hedgerows that form part of this site. If this affects trees then three trees would be planted for every tree removed by the Project, as identified in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. OS/83 – Bushey Wood The Order Limits are more than 100 m from this woodland with no direct effects on this woodland. OS/84 – Osborne's Wood As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** there would be no direct or indirect ecological effects on this woodland. OS/85 – Stock Brook With the application of the measures outlined in **7.2 Outline Code of Construction Practice [Revision D]** that protect water quality, there would be no significant negative ecological impacts on this brook. Loss of trees would be mitigated for, with three trees planted for each tree removed.
			Brentwood Borough Council BBC agrees with the green infrastructure and open spaces that have been identified in the assessment but would also support Essex CC's assertion that many of the open spaces along the route, whether public or private, form part of Essex's wider Green Infrastructure (GI) network, which supports wildlife, habitats, flood management, climate resilience and community wellbeing. ECC's position is supported by the Essex GI Strategy and Essex Local Nature Recovery Strategy (LNRS), which emphasises the importance of protecting and enhancing GI networks, not just designated parks or recreation sites.	The Applicant welcomes the feedback regarding the identification of green infrastructure and open spaces. As noted above, purchasing biodiversity units off-site would deliver the wider societal and community benefits that the council is seeking. Dependent on where the units are located, the newly created or enhanced habitats may also contribute to climate resilience, flood management and community wellbeing, as well as assisting with nature recovery. Given the large number of units that would be purchased, this would make a significant contribution to green infrastructure.

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			The applicant's assessment mainly focuses on whether land is publicly accessible or whether a numerical "surplus" of open space exists, but even small or privately owned areas may play an important ecological role. This is also a requirement of the National Planning Policy Framework (NPPF), which makes clear that planning decisions should protect and enhance green infrastructure, biodiversity and ecological networks not just formal open spaces. Several areas affected by the project – in Brentwood being primarily Woodland Sites, which even where land is not publicly accessible can provide essential buffer zones, habitat connectivity, and biodiversity value – are located within the Essex LNRS Strategic Opportunity and potential opportunity zones. The applicant's assessment does not fully acknowledge these LNRS considerations, meaning the value of certain open spaces has been understated. Further to the above, whilst the conclusions in Table B.1 may broadly be deemed reasonable, they raise questions on the impacts of the proposal against the proper consideration of alternatives. Such is the case for Ref OS/88 and Ref OS/90, where it has been concluded that the oversail of the PRoW and indirect impact of the open space is outweighed by "the benefits of the Project (including need), and having regard to the mitigation the Project has offered in respect of the indirect effect on the open space", but an offshore option, if demonstrably viable, would eliminate such impacts and obviate the need for mitigation both in Brentwood and along the entirety of the route. Lastly, BBC is concerned at the impact on Little Bladen's Wood & Blind Lane (OS/93) and on what NGET considers to be the "natural regeneration of woodland post construction", particularly as this site is recognised as an ancient woodland. BBC would also draw attention to the commitment made to ancient woodland in OS/95 and enquire as to why a similar commitment has not been made to OS/93, despite the recognition of it as "largely, if not completely, ancient woodland".	The Open Space Assessment presented in **5.6 Planning Statement [APP-085]** adopted a precautionary approach in identifying potential areas of open space. This also included the identification of land which did not appear to be publicly accessible. Furthermore, the range of sites considered extends beyond formal open spaces and includes green and blue infrastructure in accordance with NPS EN-1. The Applicant notes the feedback from Brentwood Borough Council regarding the adoption of an offshore option as a means to avoid impacting open space (and in particular OS/88 and OS/90 (River Wid). The Applicant has considered a whole range of different alternatives on the Project, including offshore, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]**, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and **5.15 Design Development Report [APP-122]**. Since the submission of the application for development consent, OS/93 Little Bladen's Wood has been reclassified as Ancient Woodland and as such, the Project-wide mitigation applicable to Ancient Woodland will be implemented at this location. This reclassification is reflected in an updated **Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. Within Little Bladen's Wood, works are proposed to modify existing Pylon PUB40 within the northern fringe of the woodland, which will result in a construction works area within 15 m of woodland but no excavation. The existing access route used for pylon maintenance will be used for the modification works. Any heavy plant / machinery will be restricted to being within 15 m of the woodland for as short a period as possible, such as only for the duration of use, and storage of plant and machinery overnight will be prohibited in these areas. The works are considered minimally invasive to the woodland with no direct impact.
			Thurrock Council The Council does not agree with the Applicant's assessment of the impacts of pylons within Maple Park. From the Council's Recreation and Leisure perspective, Maple Park is an important local green space that supports informal recreation, walking, community wellbeing, and provides accessible natural open space	The Applicant acknowledges an impact on Maple Park, given the siting of two pylons within it. Paragraphs 7.3.467-7.3.468 in **5.6 Planning Statement [APP-085]** go into detail on the impact on Maple Park; as does the Open Space Assessment set out in Appendix B, therein (ref. OS/105).

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			within a residential area. The assessment does not fully recognise the following: • The loss of recreational quality and user experience caused by the visual dominance of pylons within a valued open space. • The impact on public perception of safety, which may deter community use, particularly for families and young people. • The fragmentation of open space, reducing the functionality of the park for leisure and informal play. • Insufficient mitigation, with limited proposals to offset reductions in amenity, landscape character, and recreational enjoyment. For these reasons, the Council considers the assessment to be incomplete and under-represents the recreational, social, and wellbeing impacts associated with locating pylons within Maple Park. Meaningful mitigation, such as enhanced landscaping, improved recreational infrastructure, and long-term management commitments would be required to maintain the Maple Park's role as an important local leisure asset.	As explained in **5.6 Planning Statement [APP-085]**, this is the only technically feasible route through this area. Maple Park is large in scale (estimated as 42.3 hectares), and the Project will impact a small area of it at its furthest extent from residents on the western boundary of the site. It is considered that the position of two pylons in the south-west corner of the site would not result in the fragmentation of the open space or impact on the public perception of safety. There is no reason why the siting of the pylons in this location at the edge of the Park, adjacent to a main road, would decrease public perception of safety. The wider park, and in particular the formal recreational areas located immediately adjacent to Stanford-le-Hope will have limited or negligible impact given distances from the pylon locations. Appendix B.3 of **5.6 Planning Statement [APP-085]** finds that there is sufficient alternative open space provision in the locality of Stanford-le-Hope. Accordingly, the loss of this area is justified. In terms of mitigation at Maple Park, in locations where replacement standard tree planting is unsuitable due to the new overhead lines, low height and shallow-rooted scrub species will be included as alternative planting. Species mixes will allow for low growing and shallow-rooted tree/scrub species as an alternative in these locations.
			Braintree District Council The Council has reviewed APP-085 Appendices B1, B2 and B3. The Council agree that the impacts on the green infrastructure/open spaces would be temporary and impacts controlled via the necessary protection mechanisms (requirements).	Noted - the agreement on this matter is welcomed.
			Babergh and Mid Suffolk District Council All BMSDC Neighbourhood Plan open space designations are accurate.	Noted - the agreement on this matter is welcomed.
			Suffolk County Council SCC agrees with the assessment and conclusions of the impacts on Open Spaces in Suffolk within Appendices B1, B2 and B3 of the **Planning Statement [APP-085]**.	Noted - the agreement on this matter is welcomed.
			Tendring District Council Response to Bullet point one: TDC does not agree with the assessment or conclusions set out in Table B.1 of	• The comments from Tendring District Council in respect of the Open Space Assessment are noted. Importantly, the Open Space Assessment set out in Appendix B of **5.6 Planning Statement [APP-085]**

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			Appendix B of the Planning Statement. Our reasons are set out below. c) Green Infrastructure and Open Space (ECC led) Where matters relate to strategic green infrastructure and districtwide open space assessments, TDC defers to ECC as lead authority. However, TDC raises strong concerns regarding the robustness, evidence base and methodology used by National Grid (NG) in Table B.1 and Appendix B. There appears to be systemic flaws in National Grid's Open Space Assessment. The Open Space Assessment repeatedly claims that open spaces affected – including fishing lakes – are "surplus to requirements" and "not high quality provision", yet: • NG did not directly engage with the angling clubs or site operators whose facilities they conclude are "surplus". There is no evidence of club consultation in the Planning Statement or Appendix B. • NG offers no qualitative assessment of the social, cultural, or operational importance of these facilities. • The Assessment is based largely on desktop mapping, not user evidence, not operational data, and not club membership/inclusion data. • NG's conclusions assume that all "alternative provision" is functionally equivalent – despite no evaluation of quality, stock levels, disabled access, capacity, membership availability, or local travel burdens on anglers. • The Planning Statement admits these assessments are precautionary and based on broad brush categorisation rather than site specific fieldwork or interviews with affected communities. This makes NG's core conclusions unsupported and unreliable. Response to Bullet Point two: TDC does not agree with NG's assessment regarding Ardleigh fishing provision. Ardleigh Fishing Lake (north of Little Bromley Road) – NG's conclusion of 'no direct or indirect impacts' is indefensible NG concludes that construction and operation of pylons and the underground cable corridor will have "no direct or indirect impact on the use or function of the open space for angling". This is an extraordinary and wholly unsupported conclusion. Our concerns, based on the DCO documents, include: 1. Proximity of new pylons and conductors	has been undertaken in accordance with the requirements of NPS EN-1. I The assessment made within the Open Space Assessment and Appendix B.2 of **5.6 Planning Statement [APP-085]** aligns with the requirements of NPS EN-1 by considering each relevant policy requirement step by step, including: • Identifying the use and function of impacted open space • Identifying the interaction between the Project and areas of open space • Considering if there is a loss to use or function of open space • Considering whether mitigation is in place where a loss of use and function is identified • Considering whether a surplus of the typology of open space to be lost exists within the locality of the open space <u>Fishing Lake north of Little Bromley Road (ref. OS/44)</u> Open space ref. OS/44 is an approximately 5.8-acre irrigation lake accessed from Little Bromley Road, which has been established over the past decade as a managed angling lake. At its greatest the lake is 260 metres in length. We note the statement by Tendring District Council regarding four pylons being in proximity to the southern lake edge. Sheets 13 and 14 of **2.3 Works Plans Section C [Revision B]** illustrate underground cabling around the southern extent of the lake, it is noted that the nearest pylons TB5 and TB6 are approximately 150 m from the shore edge. It is also noted that TB5 is 51.7 m tall and TB6 is 48.7 m tall (not including the upward extent of vertical limit of deviation of 6 m). The Open Space Assessment as set out in **Appendix B** of **5.6 Planning Statement [APP-085]** considers the impact of the undergrounding on this area of open space and finds that the above ground impacts of these works will be temporary in nature and would not preclude angling activities. It is agreed that where overhead lines over sail water bodies, angling is precluded within an area 30 m either

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			– Four tall 400 kV pylons will stand up to 60 metres tall from the southern edge of the fishing lake. – The underground cable corridor runs directly south of the lake. – Overhead line over sail and EMF based safety constraints will materially compromise angling activity, lakeside access, tranquillity, and rural character. 2. NG's own Open Space Assessment contradicts its narrative – Appendix B acknowledges that where overhead lines over sail water bodies, angling is sterilised in a 30m swathe and function is lost – yet they say that it will have no direct or indirect impact on the use or function of the open space for angling – The same technical logic applies here – yet NG refuses to acknowledge it. 3. Amenity and economic impact on a countryside enterprise ignored – The lake supports angling, informal walking, birdwatching, and local countryside recreation, not just fishing – NG provides no assessment of economic viability after construction. – No landscape or tranquillity impact assessment specific to the facility exists, despite the site functioning as an important local rural amenity. 4. No evidence provided for NG's claim of 'no impact' – The Planning Statement does not cite any field survey, community consultation, operational fishing study, or expert angling assessment to support the "no impact" conclusion. – The statement is therefore assertive, unsubstantiated and methodologically unsound. 5. This represents a fundamental failure of NG's impact assessment for this location. Ardleigh Fishing Pond (between TB13–TB14) and Ardleigh Reservoir – NG's classification of these as "surplus to requirements" is baseless Appendix B explicitly records that: • Ardleigh Fishing Pond (OS/46) is entirely sterilised for angling due to the 30m exclusion zone under the 400 kV alignment.	side of the overhead line but outside of that defined area angling is still permitted. <u>Ardleigh Fishing Pond / Fishing Lake north of Colchester Road (OS/46)</u> The Applicant acknowledges that angling activities will be precluded at the fishing lake north of Colchester Road. Importantly, whilst not reported within the Open Space Assessment as it is outside the scope of that report, the Applicant has engaged fully with the operator/landowner of this fishing lake. Discussions continue with the affected operator/landowner. An impact on the function and use of this area of open space is identified, in that the angling use will be precluded due to an oversail between pylons TB13 and TB14. As such, in the first instance, in accordance with the mitigation hierarchy, the Applicant has considered alternative alignments to avoid crossing this fishing lake , however, these alternative alignments resulted in multiple angle changes that would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the new alignment in this area. The consideration of alternative alignments in Ardleigh is explained in paragraph 5.4.124 of **7.21 2024 - Design Development Report for the Project [APP-359]**. The Applicant, in discussion with the landowner, proposed creating a replacement fishing lake to the east, however, no agreement was reached. Accordingly, no direct mitigation for the loss of the fishing lake was feasible. The Applicant has investigated alternative provision and engaged with the landowner regarding creation of a new fishing pond. The Applicant has taken reasonable steps to mitigate the impact on this area of open space in accordance with paragraphs 5.11.23 and 5.11.29 of NPS EN-1. Given the loss of the use and function of the space for angling, an assessment of the provision of angling has been made, in line with the requirements of paragraph 5.11.10 of NPS EN-1 . This assessment is made in Appendix B.2 of **5.6 Planning Statement [APP-085]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Ardleigh Reservoir (OS/47) suffers partial sterilisation of its northern section. • Combined, ~9.6 acres of angling water is lost. Despite this, NG asserts: • "No evidence suggests these are high quality sites" • "Alternative provision is strong" • "Therefore their loss is acceptable" These statements are not supported by evidence: • There is no engagement with affected angling clubs • There is no record (in the Planning Statement, Consultation Report or Appendix B) that NG discussed these findings with: – Ardleigh Reservoir Consortium – Ardleigh Fishery – Local angling clubs with longstanding community ties (some dating back decades). • No understanding of angling as a sport • NG provides no assessment of: – membership pressure; – waiting lists; – species/stock levels; – accessibility or suitability of alternatives; – socioeconomic value; – Home water importance for local anglers. • The conclusion of "surplus to requirement" is methodologically invalid – A desktop radius based count of alternative lakes cannot justify eliminating community angling assets. – No qualitative assessment of value, uniqueness, accessibility, or environmental experience has been undertaken. • NG's own evidence highlights substantial recreational and open space impacts • The Open Space Assessment acknowledges material impacts on fishing lakes at OS/46 and OS/47 and classifies the impact as permanent loss of function. • Yet Table B.1 glosses these findings over. TDC therefore does not accept: • The accuracy of the Open Space Assessment in Table B.1;	There is no standard methodology for angling provision, and accordingly the methodology set out in Appendix B.2 is considered sufficient to respond to the requirements of NPS EN-1. It is understood from engagement with the fishing lake operator/landowner that angling here is limited and informal. There is also no evidence available to suggest that the fishing lake is of particularly high – quality when compared to alternative angling locations identified elsewhere in the locality and alternative facilities have been identified which are of similar provision to the fishing pond which is impacted. As noted in the commentary of Appendix B.2 of **5.6 Planning Statement [APP-085]**, Ardleigh Fly Fishing Club identifies that they previously used what is understood to be the site, however, they later moved to what is described as a more productive and secluded site elsewhere within the locality. Appendix B.2 of **5.6 Planning Statement [APP-085]** has identified significant alternative provision within a reasonable proximity (10 miles) to this fishing lake, finding 552.7 acres. 123.2 acres of this total is located within the immediate locality of Ardleigh. Therefore, given the scale of this fishing lake, at 3.3 acres, and that its current use is limited and informal, and alternative provision which offers similar facilities has been identified, it is maintained that the fishing lake is surplus to requirements. . <u>Ardleigh Reservoir (ref. OS/47)</u> The Applicant acknowledges that angling activities will be impacted at parts of the Ardleigh Reservoir in the area to the north of Wick Lane. Ardleigh Reservoir was opened in 1971. The reservoir has become an established fishery and comprises the main reservoir alongside a smaller lake - Wick Lane Lake. Wick Lane Lake is 12 acres in size and holds a wide variety of fish species similar to the main reservoir with some good-sized carp to over 30lb. Wick Lane lake is currently only open to day fishers. The larger fishing lake, to the south of Wick Lane covers an area of 120 acres. Both the main reservoir and the Wick Lane Lake hold the same fish species.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			– The assertion that Ardleigh fishing facilities are "surplus to requirements"; • The claim of "no direct or indirect impacts" on the Ardleigh lake north of Little Bromley Road; • The claim that alternative angling provision is adequate or equivalent; • The suggestion that the viability of these rural recreation businesses will not be harmed. The Council's view is that significant recreational, landscape, amenity and economic harm will arise, and that NG has failed to evidence or justify its contrary assertions.	To clarify, Appendix B.2 of **5.6 Planning Statement [APP-085]** identifies the area of the part of the reservoir north of Wick Lane (Wick Lane Lake) as 6.6 acres. However, for avoidance of doubt, angling will only be precluded in a 30-metre bufferbeyond the conductors, and this is noted at paragraph B.2.20. This still leaves a large area of the eastern bank of the part of the reservoir north of Wick Lane available for angling. To re-state Appendix B.2, angling is not currently allowed on the western bank of the reservoir in this location. The eastern bank of the reservoir is approximately 400 metres in this location. So, ample angling provision remains in situ at this part of the reservoir, and significant further provision exists in the part of the reservoir to the south of Wick Lane. First, an impact on the function and use of this area of open space is identified, in that the angling use will be precluded due to an oversail between pylons TB15 and TB16. There is limited mitigation that can be put in place in this instance, particularly given that large areas of the reservoir are still accessible for angling. Due to routeing requirements, and other constraints, the overhead lines must traverse Ardleigh Reservoir in this location. Undergrounding of the reservoir was considered, as set out in paragraph 6.5.28 of the **Design Development Report [APP-122]**. Accordingly, the Project has taken steps to consider mitigation in line with paragraphs 5.11.23 and 5.11.29 of NPS EN-1. Given the loss of the use and function of the space for angling, an assessment of the provision of angling has been made, in line with the requirements of paragraph 5.11.10 of NPS EN-1. The assessment of provision at Ardleigh Reservoir is made alongside the Fishing Lake north of Colchester Road (OS/46) in Appendix B.2 of **5.6 Planning Statement [APP-085]**. As aforementioned, there is no standard methodology for angling provision and as such the assessment made in Appendix B.2 is considered to respond to the policy requirements set out in NPS EN-1. There is no evidence available to suggest that this part of the reservoir is of particularly high-quality provision. In terms of cost, the cost of angling at this part of the reservoir is the same as

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				the remainder of the reservoir and the nearby Alton Water, which is under the same ownership (Anglian Water). Other fishing locations were also identified with similar prices in close proximity to Ardleigh Reservoir. Appendix B.2 of **5.6 Planning Statement [APP-085]** has identified significant alternative provision within a reasonable proximity (10 miles) to Ardleigh Reservoir, finding 552.7 acres. 123.2 acres of this total is located within the immediate locality of Ardleigh, including 113.7 acres at the part of Ardleigh Reservoir to the south of Wick Lane. This does not include the northern parts of the reservoir where angling would still be possible. Given the limited amount of angling provision that will be precluded, when considering provision elsewhere, and given that there are alternative facilities of similar cost and quality , it is maintained that the area of Ardleigh Reservoir where angling will be precluded is surplus to requirements.

12. Landscape and visual

Table 12.1 Landscape and visual

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
LV 1.4	The applicant	**ES Chapter 13, landscape and visual: monitoring** Paragraph 13.8.1 of **[APP-226]** states that habitats reinstated after construction would be monitored/managed for a five year period to ensure their successful establishment and regrowth. Provide further justification for this length of time.	**Chelmsford City Council** Further to the effects of climate change and recent hot summers, CCC is concerned that a timeframe of five years may not be sufficient. In CCC's experience, sometimes older year 4/5 year trees may need to be helped during a dry summer. This is an impact of climate change. CCC considers that regard should be had to the replacement of habitats beyond five years to ensure that habitats continue to survive and become established.	The Applicant notes the response. Justification for the five-year monitoring/management period is provided in reference LV 1.4 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]**. This is a typical time period used in large scale infrastructure projects. The failure rate for native tree and shrub planting falls off rapidly after the first c.2–3 years, at which point most plants tend to be becoming well established, following their movement from the nursery and replanting at the site. The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard BS 8545:2014+A1:2026[14] to achieve independence in the landscape. The Tree Council's 'Caring for newly planted trees' (2025)[15] suggest that trees should be checked annually for the first five years. Defra / Forestry Commission Guidance 'Maintain new trees after restocking' (2021)[16] also notes that trees should be looked after in the first five years.
LV 1.6	The applicant	**Landscape and visual methodology** In ES Appendix 13.1– , you state that: "Recognition of the value of a view is determined with reference to… whether it is recorded as important in relation to heritage assets (such as designed views recorded in citations of Registered Parks and Gardens (RPG) or views recorded as of importance in Conservation Area Appraisals or Neighbourhood Plans)". However, in ES Chapter 13 **Landscape and Visual [APP-226]** under Regional and Local policy, no neighbourhood plans or conservation area appraisals are noted as source material. It is understood from the **Roydon PC WR [REP1-175]** several views are protected under policy 16 of the Diss and District Neighbourhood Plan, October 2023.	**North-West and South-West of Chelmsford Parishes Group** In Written Question LV1.6, the ExA has asked the Applicant to 'ensure that all relevant neighbourhood plans, RPG description and conservation area appraisals are considered and any relevant references provided.' This follows a representation from Roydon PC regarding policy 16 of the Diss and District Neighbourhood Plan. The purpose of the Group's comment is to draw attention to similar issues relating to Broomfield NP and Writtle NP. The Group is therefore grateful to the ExA for requesting this additional detail and clarity. • Broomfield NP 1. Policy BFD2 – Protecting Broomfield's Landscape Character states: *Proposals for development outside the Settlement Boundary will be required to be accompanied by a Landscape Visual Impact Assessment or other appropriate evidence proportionate to the scale of the proposal, that demonstrates how the proposal:*	The Applicant notes the response. Confirmation of the use of all relevant neighbourhood plans, Registered Park and Garden (RPG) descriptions and conservation area appraisals to inform the assessment is provided in reference LV 1.6 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]**. The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes measures to retain and reinstate historic landscape features including protected

[14] British Standard 8545:2014+A1:2026 *Trees from nursery to independence in the landscape – Code of practice*

[15] National Highways and The Tree Council (2025) *Caring for newly planted trees*

[16] Department for Environment, Food & Rural Affairs (Defra) and Forestry Commission (2021) Guidance Maintain new trees after restocking

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Ensure that all relevant neighbourhood plans, RPG description and conservation area appraisals are considered and any relevant references provided.	*i. can be accommodated in the countryside without having a significant detrimental impact, by reason of the development's scale, materials and location, on the character and appearance of the countryside and its tranquility and distinction from the main built-up areas; and* *ii. conserves and enhances the unique landscape and scenic beauty within the Parish, having regard to the Neighbourhood Plan Landsc*ape Appraisal and Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views and the Valued Landscape identified on Map 5 and Important Views on Map 6. • Map 5 indicates the areas meeting the criteria for Valued Landscape and designated as such. Map 6 indicates the 29 Key Important Views. The data for both is drawn from the 'Review of Local Green Space, Valued Landscape and Key Views', (Drawing 5) which is attached to this representation. • Also attached is the NP Landscape Appraisal. This defines 8 local character areas, of which 4 (Areas E, F, G and H) are particularly affected by the Application. The Parishes Group's concerns are that: The impact of the Application is not illustrated or referenced in relation to the relevant Key Views. Instead, the impact from just one alternative viewpoint is presented in the ES. It is likely that Key Views 19, 20, 23,24, 26 and 27 would all be impacted; and potentially Views 6, 7 and 14. The impact on the designated Valued Landscape west of Church Green ('Land west of Church of St Mary with St Leonard, Broomfield') has not been sufficiently assessed, even though it is only about 600 metres from the OHL at its closest point. Local landscape studies associated with neighbourhood plans have been given insufficient weight in the ES, despite being more up-to-date and containing greater detail then higher-level, more generic studies referenced in the Application. The Broomfield NP Landscape Appraisal illustrates this point. The Local Character Area G, which is transected by the OHL proposed in the Application is assessed in some detail (Landscape Appraisal, p.38) and judged to be: *'highly sensitive to change and development due to its rural characteristics and elevation. It is therefore considered unsuitable for residential and commercial development'.*	lanes, in addition to the commitment set out in H06 of **7.2 Outline Code of Construction Practice [Revision D]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Writtle NP Locally Protected Lanes and Tracks form an important element in the Writtle NP (paras 8.13 – 8.17, pages 81 83), with aspirations to consider designation of 2 additional lanes. However, both the existing designated Protected Lanes, Nathan's lane and Newney Green, would be severely impacted by the OHL and pylons in the Application.	
LV 1.10	The applicant	**Residential visual amenity assessment - visualisations** The wireframe viewpoints provided in the **RVAA [APP-233] and [APP-234]** are useful to give a general understanding of the proximity of the pylons to any residential dwellings and it is noted that these are provided in accordance the Landscape Institute Technical Guidance Note (LI TGN) 2/19. However, this guidance note also allows for the type and nature of visualisations to vary depending on the project circumstances. The ExA would find it useful to have photo-montage visualisations of the properties that are included in the Stage 4 assessment to better understand the baseline views, including any existing foliage, wirescape and buildings. Provide these by Deadline 4, 12 May 2026.	**Mrs Margaret Podd** In addition to Viewpoint 2.43, there should be a visualisation from properties in Saxham Street, Stowupland looking east towards the pylons, and also from properties in Blacksmiths Lane, Middlewood Green, Earl Stonham looking west towards the pylons, so that the visual impact of the pylons from residents' homes in an acknowledged narrow corridor (see below) can be better understood. When assessing visual impacts for residents, the views from upper floor windows of homes needs to be considered, particularly with the increase in working from home and the likelihood that the workspace will be on an upper floor. There is an acknowledgement by NG that the corridor at this point is restricted (ref below). Such areas should be a priority for low pylons/T-pylons. NG has acknowledged that this section is suitable for T-pylons (covered in my registration comments): Ref: EN020027-001548-7.18 Errata 2022 - Corridor and Preliminary Routeing and Siting Study Appendices.pdf (page 21) (Accessed 08/03/26) Section D Visual effects are likely to be experienced by residents of Gislingham, Saxham Street, Stowupland, Creeting St. Peter and of the smaller settlements and farmsteads within and close to the corridor. In the vicinity of Saxham Street the corridor is restricted to a width of ~350m between residences, meaning that the line would have to pass within ~175m of residences. Recreational visual receptors who may experience effects are mainly restricted to users of the local PRoW network and users of National Cycle Network National Route 51	Residential visual amenity impacts are assessed in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA), the purpose of which is to determine whether the Project may give rise to any breaches of the Residential Visual Amenity Threshold (RVAT), in accordance with Landscape Institute Guidance Note 2/19 Residential Visual Amenity Assessment[17]. Wireline visualisations for each of the properties which fall within the RVAA Study Area (of 200 m either side of the Project centreline) are presented in Annex A of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**. Of the locations mentioned, only one property falls within the RVAA Study Area: Owls Farm at Middlewood Green (property ref. B11). It is recognised that properties beyond the Study Area may experience visual effects as a result of the Project, but beyond this distance, effects are not anticipated to be so substantial that the RVAT is likely to be breached, therefore, in the context of this assessment, no other specific visualisations have been deemed necessary for properties at Saxham Street, Blacksmiths Lane, Middlewood Green or Earl Stonham.
LV 1.14	All local authorities	**ES Appendix 13.5 National Landscape assessment study - 2** The study **[APP-235]** concludes that: "In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities	**Councillor Susie Goldring** The social qualities of the Dedham Vale include the wide open historic landscapes which are untroubled by modern infrastructure, which industrialisation has not reached, and which remain as they have been over hundreds of years. These views have been captured by artists such as Constable and Gainsborough and are a national treasure. National Grid has demonstrated that	The Applicant notes the concerns raised by Councillor Susie Goldring in relation to the Project, Dedham Vale National Landscape and its setting. The assessment of effects of the Project on the special qualities of Dedham Vale National Landscape, including those linked to the famous artist John Constable, is presented in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment**

[17] Landscape Institute (2019) *Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		of the National Landscape are judged to be minor and not significant (adverse)" (paragraph 13.3.8) The local authorities are asked whether they agree with this conclusion and provide reasoning if you do not.	their proposed pylons, sealing end compounds and the EACN whilst not being built within the vale will be hugely visible from within it. They themselves say that up to 23 pylons will be visible from up to half of the vale and up to 35 pylons in places. Little Horkesley is lucky enough to be on the edge of the AONB and enjoys the views both from and to the area. It will be devastating to irrevocably damage such a beautiful area. This cannot be described as "minor" or "insignificant" damage. It is enormous and will destroy the most social qualities of the vale for all future generations. The route MUST be modified to avoid altogether both the Dedham Vale and its setting as required in planning policy specifically set out to protect it. 'Even residual damage is unacceptable'.	**Study [APP-235]**. The Project would result in significant adverse effects on some of the special qualities of the Dedham Vale National Landscape during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant. The effect of construction activity on the special quality 'Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today' is assessed as a major and significant (adverse) effect, localised along the length of the underground cable corridor in the short to medium term. At operation (and maintenance) it is considered that there would be a minor and not significant (adverse) effect on this special quality. The fact that the Project will be visible from within the Dedham Vale National Landscape is not disputed. Figures A13.5.6 to A13.5.12 contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility of the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. In addition, the ZTV only takes woodland blocks into consideration (modelled at 15 m in height), as explained in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** (paragraph 13.6.6): *'Woodland blocks were modelled into the ZTVs, using the National Forest Inventory mapping dataset which was assigned a height of 15 m.'* It does not consider hedgerows or trees that do not form part of this data set, and which will filter views in practice. For example, consideration of effects on Viewpoint 4.07 can be found **in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]** pdf page 17. Viewpoint 4.07 is within Dedham Vale National Landscape to the west of Little Horkesley, approximately 1.7 km from the nearest above ground structure of the Project and is assessed as having a negligible and not significant (adverse) effect.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				In accordance with National Policy Statement EN-1 and EN-5 (2024) policy, the Applicant has applied the strong presumption for 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 (2024) policies. 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 (2024) policies on undergrounding.
			Essex County Council **Babergh and Mid Suffolk District Councils** ECC/BMSDC does not agree. The effect identified at construction on the special qualities of the National Landscape will remain extant at operational phase with permanent physical structures. ECC would refer to the following legislation in respect of this matter. NPPF: 15. Conserving and enhancing the natural environment Paragraphs 187 to 201 189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads 66. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas 190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;	The Applicant notes Essex County Council's and Chelmsford City Council's position. **5.7 Policy Compliance Document [APP-086]** which should be read in conjunction with **5.6 Planning Statement [APP-085]** sets out an analysis of the compliance of the Project with the specific relevant policies, including those listed within the National Planning Policy Framework[18]. The Applicant's position on furthering the purposes of the National Landscape 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]** and summarised from pdf page 88 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Please also refer to the above response to similar concerns raised by Councillor Susie Goldring in relation to the Project, Dedham Vale National Landscape and its setting. In terms of permanent physical structures within Dedham Vale National Landscape, there will be a series of small above ground link pillars and marker posts, as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** at paragraph 4.9.14 and illustrated in Image 4.19. These features will be required every 500 m to 1 km along each cable trench. Typical dimensions are 2 m x 0.7 m x 1.5 m in addition to, for example, a timber fenced area around them, typically 3 m x 4 m. Whilst visible, it is not the case that they will result in long term significant effects on the special qualities of the National Landscape.

[18] Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. Section 85 of the CROW Act The s.85 duty to seek to further the purpose of conserving and enhancing the natural beauty of AONBs applies to the full range of development management decision making, including considering applications for outline, full and reserved matters, listed building consent, applications for works to protected trees, and prior notifications, along with enforcement work on planning breaches. **Chelmsford City Council** The Dedham Vale national landscape does not affect the Chelmsford Administrative Area. CCC defers to ECC Place Services regarding any other comments on this matter. Place Services explain that they do not agree. The effect identified at construction on the special qualities of the National Landscape will remain extant at operational phase with permanent physical structures.	
			Dedham Vale National Landscape and Stour Valley Partnership The National Landscape Partnership broadly concur with this view that the majority of negative impacts will be felt by the National Landscape during construction. However, the National Landscape Partnership consider the impacts during operation, while noting they are assessed as 'minor and not significant (adverse) are still a negative and not contributing to statutory purpose to conserve and enhance natural beauty.	The National Landscape Partnership's response is noted. The Applicant's position on furthering the statutory purposes of the National Landscape, to conserve and enhance natural beauty, is set out from pdf page 88 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
			Great Horkesley Parish Council • Great Horkesley Parish Council does not agree that damage to the Dedham Vale National Landscape will only be "minor / not significant" once the project is in operation. The national landscape falls within our Parish and the proposed overhead line and underground section, with CSE compound, traverse our Parish near to the border with the national landscape. • The Dedham Vale is a tranquil space of wide open countryside untouched by modern infrastructure. It has an important historic and cultural quality and is known as "Constable Country" for its famous	Great Horkesley Parish Council's position is noted. Please refer to the above response to similar concerns raised by Councillor Susie Goldring in relation to the Project, special qualities of Dedham Vale National Landscape and associations with painters including Constable. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. While there would be significant effects during construction due to the installation of underground cables, these would reduce

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			depiction in noted landscape art by Constable; it is also associated with other local famous painters including Gainsborough. It has remained largely unchanged since it was painted and is both an important local amenity and tourist attraction for that very reason. Once the landscape has been altered, this is harm that will last forever. • The underground section has a wide construction swathe. Many hedgerows will be destroyed and trees removed. The ground will be disrupted and the landscape altered and scarred. • It is not just the area within the national landscape itself that faces irreparable harm. It is also important to consider its setting. The infrastructure including pylons and sealing end compounds situated within our Parish and neighbouring parishes will be significant blots on the landscape. The local area is a flat plateau and open countryside at high local elevation with no significant infrastructure and the skyscape is clear. The proposed infrastructure will be intrusive and dominate the skyscape. The pylons are 50m high, dwarfing the local landscape characterised by occasional trees and low-rise buildings (including several historic listed buildings). National Grid accepts that many pylons will be seen from within the national landscape (23 visible within up to half of the vale; up to 35 pylons in places). None should be seen. The Causeway / A134 is an important gateway into the Dedham Vale and the pylons and CSE Compound will be seen from it as people journey from Colchester into the vale at Great Horkesley into Nayland. • The impact of each and every pylon and CSE compound and related infrastructure is significant and not minor; moreover the cumulative impact from all of them is seriously harmful. • The route of the power line through the Dedham Vale is far from a "necessary evil"; it is not needed at all and is a significant "kink" in the overland route in order to connect to the EACN at Ardleigh – only because National Grid themselves decided to do so (the connection point being pre-determined by National Grid). The route ought never to have crossed the Dedham Vale National Landscape and need not. It should be avoided altogether, as required in planning policy, and the setting also needs to be protected. No damage is acceptable ('even residual damage is unacceptable'). Harm should be avoided. Further, the overhead line from Ardleigh to Great Horkesely is unnecessary intrusive infrastructure in	and gradually become not significant during operation, as vegetation cover is restored. Tree and hedgerow removal has been minimised in Dedham Vale National Landscape though the clipping of the Order Limits and restricting the Limits of Deviation in places. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to further reduce removal of trees/hedgerows as far as practicable. This is recorded as commitment GG14 within **7.2 Outline Code of Construction Practice [Revision D]**. Measures to avoid/mitigate impacts to all trees are also a Project commitment: LV05 in **7.2 Outline Code of Construction Practice [Revision D]**. Section 9.4 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** outlines the commitment to reinstate hedgerow field boundaries. With regard to the potential visibility of the Project, the Applicant has undertaken both desk top studies and field work to inform the assessment of effects on the special qualities of Dedham Vale National Landscape. It is important to note that the desk-based Zone of Theoretical Visibility (ZTV) mapping does not take into account reduction in perception of the infrastructure with increasing distance, or filtering by vegetation other than that included in the modelling. As set out in paragraph 13.6.6 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, the ZTV accounts for woodland blocks, modelled at 15 m high, but does not consider the additional screening and filtering provided by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area. The Applicant acknowledges that some of the proposed pylons would be distantly visible from parts of the National Landscape but this would not significantly affect the special qualities of the National Landscape as set out in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. It is important to note that being able to see the Project does not equate to a significant effect. Paragraph 5.10.34 of National Policy Statement EN-1 (2024) states that *'The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent*'. From the National Landscape, much of the Cable Sealing End (CSE) compounds (Great Horkesley (EACN side) and Great Horkesley (Tilbury side)) would be screened

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			the setting of the national landscape. It is unacceptable industrialisation and harmful to both the Dedham vale itself and its setting. National landscapes have their special designation in order to be protected. This protection needs to be real and not illusory. The special quality of this landscape, a national treasure, should be protected and preserved for the enjoyment of both present and future generations.	by existing tree cover and, over time, mitigation planting within the Environmental Areas around the CSE compounds would increase screening/filtering. Furthermore, at a distance of approximately 1.3 km, gantries would be difficult to perceive, as set out in Table A13.1.1 of **6.13.A5 Environmental Statement Appendix 13.5 – National Landscape Assessment Study [APP-235]**. People travelling along the Causeway / A134 would not pass beneath the proposed 400 kV overhead line as the Project would be underground in this location. The effect on people travelling on the A134 The Causeway is considered under Visual Receptor Area (VRA) D3 Great Horkesley and Horkesley Heath within **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Views from the A134 would be filtered by existing vegetation and would be over approximately 0.75 km from the Great Horkesley (EACN side) CSE compound. Mitigation planting in the Environmental Area around the CSE compound would further filter views in the long term. Indicative proposals are illustrated in **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. The general requirement for the East Anglia Connection Node (EACN) substation was defined by the independent National Energy System Operator and reflects the general location of the wind farm customers. Alternative locations for the EACN substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards partly due to additional challenges and effects associated with that as a general location and partly benefits of a Tendring peninsula location (see paragraph 3.5.53 in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**). The selected location for the EACN substation east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The Applicant has assessed various alternative corridors around the Dedham Vale National Landscape and alternative locations for the EACN substation in **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**, **6.3 Environmental Statement**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				Chapter 3 - Alternatives [APP-127] and the 2025, 2024, and 2023 Design Development Reports **[APP-122, APP-359 and APP-358]**. None of these alternatives are preferred for the reasons set out in these reports.
			Colchester City Council • CCC disagree that the impact of the project in operation will not be adverse. To the contrary, with National Grids own submissions showing that the EACN will be visible over 25% of the Dedham Vale, between 11 and 23 pylons visible from individual viewpoints across 50% of the Vale, and up to 35 pylons visible at some locations within the Vale. This is manifestly a very material impact and cannot be dismissed as immaterial, cannot be described as 'not adverse'. To the contrary it amounts to a very significant industrialisation of the National Landscape which is entirely contrary to its purpose and directly harms its important qualities. • CCC disagree that National Policies have been appropriately applied. Per NPS-EN5 the Dedham Vale should have been "avoided altogether" and that 'Even residual risk is unlikely to be acceptable in planning terms'. **Braintree District Council** The National Landscape does not fall within the remit of Braintree District Council, however, we support the views of the Council's that share a boundary with the National Landscape including the AONB Partnership group.	Colchester City Council's position is noted. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. While there would be significant adverse effects during construction due to the installation of underground cables, the Applicant's position is that the long-term adverse effects on the special qualities of the National Landscape will not be significant. In terms of permanent physical structures within Dedham Vale National Landscape, there will be a series of small above ground link pillars and marker posts, as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** at paragraph 4.9.14 and illustrated in Image 4.19. These features will be required every 500 m to 1 km along each cable trench. Typical dimensions are 2 m x 0.7 m x 1.5 m in addition to, for example, a timber fenced area around them, typically 3 m x 4 m. Whilst visible, it is not the case that they will result in long term significant effects on the special qualities of the National Landscape. The Applicant recognises the statutory duty, in accordance with section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been satisfied in respect of the Project. This is set out from pdf page 88 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Please refer to response above to Great Horkesley Parish Council on theoretical visibility of the pylons. Duties under the Electricity Act 1989 require the Applicant to operate in an efficient, coordinated and economical way. NPS EN5 inherently suppoorts the Electricity Act duty withe position that an overhead line is the strong starting presumption for electricity network developments in general and this is reflected in the National Policy Statement (NPS) policy context. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In accordance with NPS EN-1 (2024) and NPS EN-5 (2024)

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				policy, the Applicant has applied the strong presumption for 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 (2024) policies. Details are set out in **5.15 Design Development Report [APP122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant EN-5 (2024) policies on undergrounding. The Applicant notes that transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment Study Area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.
			Joanne Lesley Elliott & Richard James Guy Davies The adverse effects on the special qualities of the Dedham Vale National Landscape would be significant and permanent. It has been widely documented that significant numbers of pylons would be visible from MANY locations within the National Landscape and up to 60 structures visible simultaneously from some of the most elevated positions. The national landscape would be surrounded by a ring of steel, the tranquillity and beauty of the whole area and historical feel to the setting would be totally destroyed. The only acceptable way to mitigate this is to extends the undergrounding for several miles either side of the National Landscape so no new pylons would be visible from any part of the National landscape. This is a valuable amenity in terms of businesses and tourism but also for the mental health and wellbeing of the surrounding community. It is not possible to provide mitigation through financial incentives to enhance the landscape, do not allow it to be destroyed in the first place. Some things are priceless.	The Applicant has responded to similar landscape and visual concerns raised by Little Horkesley Parish Council on pages 568 and 569 of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on businesses. Underground cables have been proposed within the Dedham Vale National Landscape, as well as areas located south-east and south-west of the Dedham Vale National Landscape. **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** assessed that no significant effects are anticipated on the special qualities of the National Landscape. Therefore, no significant effects on businesses or the tourism economy are anticipated. Community mental health and wellbeing impacts associated with changes to landscapes and the views that exist during the construction period have been assessed in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** in paragraphs 10.7.21 to 10.7.31 (construction) and paragraphs 10.7.120 to 10.7.131 (operation). The assessment for

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				both construction and operational phases conclude that, whilst there is scientific evidence identifying a link between visual change and health outcomes, this is not considered to result in extensive change. Health deprived populations would not be disproportionately affected and no significant effects have been identified.
			Mark Ian Weeks Passmore • In LV1.14 you asked the councils to say whether they agree with NGs assessment that damage to the Dedham Vale National Landscape will be "minor / not significant" once the project is in operation. • Dedham Vale is an Area of Outstanding Natural Beauty and includes wide open historic landscapes which are not blighted by modern infrastructure. Industrialisation has not occurred and they remain as they have been over hundreds of years. • The views have been captured by artists such as Constable and Gainsborough and are a national treasure. Much of the eastern end of the National Landscape is associated with the celebrated landscape artist John Constable RA, and many of the views he painted remain recognisable today. • The Dedham Vale and other areas such as the Colne Valley are characterised by peace and quiet and freedom from modern development. As National Grid's own baseline assessment records, the National Landscape's tranquillity is a defined and formally assessed special quality, identified through the Natural Beauty indicators framework. • The elevated viewpoints, with their characteristic "large sky" quality, are integral to the designation. They were specifically identified by the Dedham Vale National Landscape Authority in the EIA scoping process as requiring assessment through the ZTV study. The vale provides facilities for so many people to relax which is very important for their personal and mental wellbeing. This proposal will result in considerable permanent damage in this respect. The Dedham vale also attracts significant numbers of visitors to the area each year and is a major contributor to the financial value of tourism in Essex, currently estimated at £3.5 billion per year. Millions of visitors come to the area each year and thousands of people are employed.	The Applicant has responded to similar landscape and visual concerns raised by Great Horkesley Parish Council and Councillor Susie Goldring as above. **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of potential impacts of the Project on the tourism economy. Paragraph 15.5.18 of the chapter points to the value the Dedham Value National Landscape contributes to the local economy. Embedded mitigation measures specifically include underground cabling at four locations instead of overhead line, including (but not limited to) areas through the Dedham Vale National Landscape, and areas located immediately north and south of the Dedham Vale National Landscape. This aims to minimise permanent visual effects and associated knock-on effects on recreation and tourism assets. Paragraph 15.7.17 of **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** notes that, whilst it is acknowledged that there are significant residual visual changes, construction traffic noise and changes in journey and amenity at particular locations anticipated as a result of the Project, these effects are not expected to affect the Wider Study Area as a whole and are unlikely to deter visitors or substantially alter the appeal of the destination for tourists in the Wider Study Area, which includes the Dedham Vale Natural Landscape.
			Penelope Ann Richards Landscape will be "minor / not significant" once the project is in operation. Dedham Vale is an AONB and	The Applicant has responded to similar landscape and visual concerns raised by Great Horkesley Parish Council and Councillor Susie Goldring as above.

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			includes wide open historic landscapes not blighted by modern infrastructure. The environment remains as it has been over hundreds of years. The views have been captured by artists such as Constable and Gainsborough, both famous artists, and are a national treasure. Much of the eastern end of the National Landscape is associated with the celebrated landscape artist John Constable RA, and many of the views he painted so long ago remain recognisable today. The Dedham Vale and other areas such as the Colne Valley are peaceful and quiet and free from modern development. National Grid's own baseline assessment records that the National Landscape's tranquillity is a defined and formally assessed special quality, identified through the Natural Beauty indicators framework. The elevated viewpoints, with their characteristic "big sky" quality, are integral to the designation. They were specifically identified by the Dedham Vale National Landscape Authority in the EIA scoping process as requiring assessment through the ZTV study. The vale provides facilities for so many people to relax which is very important for their personal and mental wellbeing. This proposal will result in considerable permanent damage in this respect. It should also be noted that a high proportion of properties in the Dedham Vale are listed. The Dedham vale also attracts very large numbers of visitors to the area each year and is a major contributor to the financial value of tourism in Essex, currently estimated at £3.5 billion per year. Millions of visitors come to the area each year and thousands of people are employed in the tourist industry. The Project as proposed would cause significant lasting harm. The project includes approximately 159 km of new overhead line supported on approximately 510 steel lattice pylons at approximately 50 metres in height, with approximately 25 km of underground cabling, some of which is located through the Dedham Vale National Landscape, and six new Cable Sealing End (CSE) compounds. National Grid has demonstrated that their proposed pylons, sealing end compounds and the EACN whilst not built within the vale will be very visible from within it. They themselves say that as many as 23 pylons will be visible from up to half of the vale and up to 35 pylons from some places. Regulations state that pylons should not be visible from within an AONB but in these proposals it is well documented that this will not be the case and therefore that these proposals are not compliant.	A similar response relating to impacts on mental health and wellbeing has been included in the response to Joanne Lesley Elliott & Richard James Guy Davies. A similar response relating to impacts on the tourism economy and the Dedham Vale Natural Landscape has been provided for Mark Ian Weeks Passmore. For routeing, see response to Great Horkesley Parish Council at LV 1.14 above.

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			The construction would take several years and would create vast amounts of destruction to the environment and to natural habitats. It would severely dislocate the lives of people living along the route and further afield. Tourism would be badly affected and as a tourist attraction the area will be destroyed. Such damage would still be evident during the foreseeable future and much would be permanent. This cannot be described as "minor" or "insignificant" damage. It is enormous and would destroy the natural beauty and most social qualities of the vale for all future generations. The route MUST be modified to 'avoid altogether' both the Vale and its setting as required in planning policy specifically set out to protect it. 'Even residual damage is unacceptable'. Similarly the project should not be permitted to destroy other rural settings including the Colne Valley. The destruction and collateral damage that will inevitably arise from the project as currently proposed is simply not necessary and should not arise. It is most regrettable that NG have not properly assessed other options, in particular an offshore route.	
			Sir Bernard Jenkin MP & James Cartlidge MP *[Note: this submission is stated to also respond to LV1.17 and LV1.22 however these are not duplicated within this document. The response provided here should be considered to also respond to the same comments made under LV1.17 and LV1.22].* We write as Members of Parliament representing constituencies that include the Dedham Vale National Landscape to set out our collective position on the Norwich to Tilbury proposals currently under examination. This position reflects not only our own concerns but also those of our constituents, who have expressed strong and consistent opposition. This submission responds to the Examining Authority's First Written Questions (ExQ1), in particular LV 1.14, LV 1.17 and LV 1.22, which go directly to the central issue of landscape and visual impact within the Dedham Vale National Landscape. These concerns are also reflected in the representations of the Dedham Vale Society, as well as in submissions made by Colchester City Council and Tendring District Council, all of whom have raised significant objections to the current proposals and their impact on the National Landscape. These questions engage directly with the requirements of NPS EN-5, which establishes a clear policy framework	The Applicant notes the concerns raised by Sir Bernard Jenkin MP and James Cartlidge MP in relation to the Project, Dedham Vale National Landscape and its setting. In response to point (1), the assessment of effects of the Project on the special qualities of Dedham Vale National Landscape is presented in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. The Project would result in significant adverse effects on some of the special qualities of the Dedham Vale National Landscape during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant. The Applicant wishes to make clear that there is a distinction in assessment for Environmental Impact Assessment between the likely significance of effect (significant/not significant) and whether the effect is beneficial/adverse/neutral. For example, an effect can be 'not significant' and adverse, e.g. a minor adverse effect. The fact that the Project will be visible from within the Dedham Vale National Landscape is not disputed. Figures A13.5.6 to A13.5.12 contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of discrete

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			for nationally designated landscapes. The policy requires that such landscapes should be avoided altogether and further states that even residual harm is unlikely to be acceptable in planning terms. In this context, the current proposals fail to meet the policy test for the following reasons: 1. There must be clear disagreement with any suggestion that the operational impacts of the scheme would not be adverse. National Grid's own evidence demonstrates that the East Anglia Connection Node (EACN) and associated infrastructure would be visible across a substantial proportion of the Dedham Vale National Landscape. This includes visibility across approximately a quarter of the Vale, with between 11 and 23 pylons visible from viewpoints across roughly half of the area and up to 35 pylons visible from certain locations. This degree of visibility represents a significant and unavoidable visual intrusion. It cannot reasonably be characterised as "not adverse". On any objective assessment, it amounts to a marked and harmful industrialisation of a nationally protected landscape, directly undermining its character, tranquillity and special qualities. The view that the Dedham Vale would be irreparably harmed is widely held by residents, local authorities and stakeholders. It is not for National Grid alone to determine the special qualities of the landscape. The voices of those who live in, use, and value the Vale must carry significant weight in this assessment. 2. It is not accepted that national policy has been appropriately applied. Section 2.9.17 of the NPS EN5 requires National Grid to "avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence." In addition, section 2.9.12 makes clear that even residual impacts within nationally designated landscapes are unlikely to be acceptable in planning terms. The current proposal fails to meet this test. It introduces large-scale transmission infrastructure in close proximity to, and with extensive visibility from, the Dedham Vale National Landscape, resulting in clear and significant harm. The existence of alternative options which avoid the Dedham Vale National Landscape altogether, such as the EAS1 route identified within the Strategic Options Backcheck & Review, demonstrates that avoidance was feasible. The failure to pursue or properly assess	sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility of the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. In addition, the ZTV only takes woodland blocks into consideration (modelled at 15 m in height), as explained in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** (paragraph 13.6.6): '*Woodland blocks were modelled into the ZTVs, using the National Forest Inventory mapping dataset which was assigned a height of 15 m*.' It does not consider hedgerows or trees that do not form part of this data set, and which will filter views in practice. In response to point (2) the Holford Rules set out in paragraph 2.9.17 of National Policy Statement (NPS) EN-5 (2024) state that applicants should (not must), '*avoid altogether, if possible, the major areas of highest amenity value...*' The reasoning behind the decision to route through the National Landscape and consideration of other options has been summarised in Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** in addition to details of how features within the National Landscape have been avoided. Full details of the decision making are contained within Section 5.5 of **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** which has been reviewed within the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**). **5.6 Planning Statement [APP-085]** 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]**. In response to point (3), the approach to selecting the Landscape and Visual Impact Assessment (LVIA) viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of

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			such alternatives is inconsistent with the requirement to avoid harm altogether. 3. We disagree that the viewpoints presented are sufficient or appropriate to assess the true level of harm. The selected viewpoints do not adequately capture the cumulative and wide-ranging visual impacts demonstrated in the Applicant's own visibility analysis. In particular, they fail to reflect the extent to which multiple pylons and associated infrastructure would be visible across large parts of the Vale and do not clearly present the degree of harm illustrated in the reverse viewfall diagrams. As a result, the visual assessment understates the scale, extent, and significance of the impact on the National Landscape. These issues demonstrate that the proposals do not satisfy the requirements of NPS EN-5 in relation to nationally designated landscapes. The level of harm identified is substantial and, in its current form, not adequately addressed through the proposed mitigation. The failure to avoid the Dedham Vale altogether represents a fundamental conflict with national policy. Accordingly, these matters go to the heart of whether the application is capable of lawful consent.	**6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 **[REP1-010 to REP1-032]**). The viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. A summary of the assessment of viewpoints within Dedham Vale National Landscape is provided in Table A13.1.2 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**.
			Villages Against Pylons The Special Qualities The Dedham Vale National Landscape covers 90 square kilometres on the Essex/Suffolk border and is designated for the outstanding natural beauty of its landscape, formally assessed against six natural beauty factors. These factors — and the specific qualities they produce in this particular landscape — are set out inter alia in the Dedham Vale AONB Natural Beauty and Special Qualities report (Alison Farmer Associates, 2016), a Countryside Commission report 'The Dedham Vale Landscape, An Area of Outstanding Natural Beauty' dated 2017, and numerous public comments and statements from those living within, visiting, using and enjoying the Vale and its setting. Those qualities are: Landscape quality and scenic quality. An intimate, ancient lowland broad river-valley character. Gently undulating plateau dissected by the Stour valley and its tributaries; traditional irregular field patterns; species rich hedgerows; meadows, mills and historic villages. Much of the eastern end of the National Landscape is associated with the celebrated landscape artist John Constable RA, and many of the views he painted remain recognisable today.	The Applicant has responded to a large number of similar landscape and visual concerns raised by Colchester City Council, Great Horkesley Parish Council and Councillor Susie Goldring above. In addition to this, the Applicant notes Villages Against Pylons has concerns that some figures split the view of Dedham Vale National Landscape over several pages, including the Zones of Theoretical Visibility (ZTVs) illustrated in **6.13.F8 Environmental Statement Figure 13.8 - ZTV of Proposed 400kV Overhead Line by Project Section heat mapping number of structures theoretically visible version [APP-244]** and **6.13.F9 Environmental Statement Figure 13.9 - ZTV of Proposed 400kV Overhead Line by Project Section proportions of structures visible version [APP-245]**. The Applicant wishes to clarify this is due to the scale of the mapping at 1:50,000 and not intended to obscure understanding. As recognised in the Villages Against Pylons response, **6.13.F19 Environmental Statement Figure 13.19 - ZTV within Dedham Vale National Landscape [APP-255]** was provided for completeness. This is at a smaller scale of 1:75,000 to illustrate the entire National Landscape together with a ZTV of the Project.

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			Relative tranquillity. The Vale is characterised by quietness and freedom from modern development. As National Grid's own baseline assessment records, the National Landscape's tranquillity is a defined and formally assessed special quality, identified through the Natural Beauty indicators framework. Traditional Character. Contributed to by red brick tile and timber-thatch farm houses set in open landscape, evocative of Constable's time and historic rural England, especially in the area in the vicinity of Wormingford. Long-distance views and large skies. The plateau edges — at Little Horkesley, Wormingford, Langham, East Bergholt, Stratford St Mary and along the northern and southern valley ridges — afford wide, open views across the vale floor and outward across the surrounding countryside. These elevated viewpoints, with their characteristic "large sky" quality, are integral to the designation. They were specifically identified by the Dedham Vale National Landscape Authority in the EIA scoping process as requiring assessment through the ZTV study. Natural and cultural heritage. The valley floor's functioning river, grazing marshes, ancient woodland, traditional field boundaries, and the buried and visible archaeology of millennia of human settlement. The village of Stratford St Mary, the hamlet of Flatford, the church plateau at East Bergholt and the mill complex at Flatford are among the most intensely heritage-significant groupings in lowland England. How the Project Causes Lasting Harm The project includes approximately 159 km of new overhead line supported on approximately 510 steel lattice pylons at approximately 50 metres in height, with approximately 25 km of underground cabling, some of which is located through the Dedham Vale National Landscape, and six new Cable Sealing End (CSE) compounds. The underground section through the boundary of the National Landscape is presented as the primary mitigation. But the overhead line does not simply stop at the designated boundary. It transitions, via Cable Sealing End compounds, to underground cable — and those compounds, together with the pylons immediately beyond them, stand within direct sightlines of the protected landscape and its most valued viewpoints. We have previously highlighted the failings in National Grids approach and their wilfully narrow interpretation as to the requirements of National Policy. As set out, their	The Applicant wishes to clarify that the reverse ZTV contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** (Figure A13.5.3), does not represent theoretical visibility of the Project. The mapping was undertaken as a theoretical exercise to aid the understanding of potential visibility from the National Landscape as a whole, irrespective of the Project. This helped inform consideration of setting and the assessment of effects on the special qualities of the National Landscape, in combination with analysis of Project-specific ZTVs and extensive field based observations. Further detail about the reverse ZTV is provided in paragraphs A.5.42 to A.5.49 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Figures A13.5.6 to A13.5.12 contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of discrete sections of the Project that fall within 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility related to the Project because they indicate the theoretical visual influence of pylons more local to the area in question, rather than considering the entire Project. It is important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. In addition, ZTVs only take the main blocks of woodland into account, modelled at a height of 15 m. They do not consider hedgerows, individual or field trees, so overstate potential visibility, which will be reduced in practice. Figures A13.5.6 and A13.5.7, contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**, illustrate the theoretical visibility of the pylons closest to Wenham Grove Cable Sealing End (CSE) compound. These ZTV figures indicate little to no visibility from Langham plateau. In addition to this, the Wenham Grove CSE compound would be over 8.5 km north of Langham plateau. Over such distances the CSE compound and associated pylons would be barely perceptible. Figures A13.5.8 to A13.5.10, contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**, illustrate the theoretical visibility of the pylons between Ardleigh and Great Horkesley. The Applicant recognises

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			interpretation is objectively wrong. National Grid are estopped from arguing cost as a reason to use Pylons in any location which would cause even residual harm to the National Landscape. We reiterate those points here. National Grids own documents illustrate significant and lasting harm to all of these qualities: APP-244: 6.13.f8: It is outrageous that National Grid have chosen to split the view of the Dedham vale across several pages, presumably this is intentional and designed to obscure understanding. Piecing the views back together it becomes clear that between 9 and 23 pylons will be visible in approximately half of the Vale, that 23 37 pylons will be visible along both ridges at the boundary, and that if to 52 pylons will be visible in particular locations within the Vale APP-245: 6.13.f9: Once more split across several pages, these diagrams clearly illustrate that the FULL HEIGHT of 50m pylons will be visible from extensive viewpoints within the Vale, on both sides of the Valley, and especially along the ridges. The zones from within which full height of Lyons will be visible extends to approximately 25% of the Vale. This view is an extremely conservative (in the sense that it minimises the perceived impact) interpretation of the problem as it requires visibility of a FULL pylon. The "reverse one of theoretical visibility" methodology — documented in diagram A13.5.3 lately provided by National Grid — is the most appropriate measure of visual intrusion, because it includes partial views of the top half of pylons above an open agricultural horizon. APP-255: 6.13.f19: This document is better prepared, illustrating the whole of the Vale on one page. In doing so it demonstrates that the proportion of the Vale from which no infrastructure will be visible is less than 20 percent of its area and is restricted to just the very bottom of the valley immediately adjacent to the Stour. The statement that the Vale will not be impacted during operation is outrageous. The Stour itself is one, but only one, of the special qualities. The idea that it exists in isolation and that people would wish to look directly at it from its banks and not be impacted by what they see as they walk, bicycle or drive through the Vale towards it is nonsense. Read together, these figures establish the following, on National Grid's own modelling: Between 11 and 30 pylon structures are simultaneously visible from many locations within the National Landscape. From the most exposed elevated positions on the northern plateau — including the high ground at Langham and around East Bergholt — between 50 and	these ZTV figures indicate small areas of theoretical visibility from East Bergholt plateau and areas to the north of Dedham Vale National Landscape. The overhead elements of the Project would be over approximately 5 km south of the East Bergholt plateau which would reduce perceptibility. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. For example, Viewpoint 3.20 which can be found in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]**, pdf page 132. Viewpoint 3.20 is approximately 4.2 km from the nearest above ground structure of the Project. Effects are judged to be minor and not significant. The Applicant has responded to concerns raised in relation to the pylons connecting into the Great Horkesley (Tilbury side) CSE compound previously in relation to REP1-326 on page 312 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**. With regard to the conclusion of the assessment of effects on Dedham Vale National Landscape the Applicant wishes to clarify that paragraph 13.3.8 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** states '*In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be minor and not significant (adverse).*' The Holford Rules set out in paragraph 2.9.17 of National Policy Statement (NPS) EN-5 (2024) state that applicants should (not must), '*avoid altogether, **if possible**, the major areas of highest amenity value...*' The reasoning behind the decision to route through the National Landscape and consideration of other options has been summarised in Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** in addition to details of how features within the National Landscape have been avoided. Full details of the decision making are contained within Section 5.5 of **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** which has been reviewed within the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project**

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			60 structures are visible simultaneously. This is acknowledged in National Grid's own Preliminary Environmental Information Report figures 13.8.1 and 13.8.2, the predecessor documents to F8 and F9, which the PEIR produced prior to the DCO application: referenced at ES Chapter 13, Section 13.3. The worst-affected and worst-impacting locations are: Langham plateau. Langham sits on the valley rim — the elevated ground from which the classic "large sky" views across the vale floor are obtained. From here, the overhead line approaching from the north via the Wenham Grove Cable Sealing End Compound (north of Stratford St Mary) is visible in the middle distance. Multiple full structures are within the ZTV for this location. This is one of the locations from which Constable himself painted. East Bergholt plateau. The birthplace of Constable, on the northern plateau, commands westward views across the Stour Valley. The ZTV maps show that project structures are theoretically visible from this position in those westward views. The southern ridge from Ardleigh to Great Horkesley. At the southern end of the underground section, the line re-emerges above ground from the EACN to Great Horkesley. The EACN together with Pylons in these locations great contribute to the view falls across the easter half of the Vale. Little Horkesley / Great Horkesley (Tilbury Side). At the southern end of the underground section, the line re emerges above ground via the Great Horkesley (Tilbury side) Compound which is in fact in Little Horkesley. This is effectively the southern gateway to the protected landscape approaching from Colchester. The compound and associated pylon re-emergence are within sightlines of the National Landscape boundary, introducing industrial structures into the approach corridor and into views looking back into the Vale, and the infrastructure there also being greatly visible from within the Vale along higher ground on both sides of the river. There were very straightforward opportunities to reduce harm here by removing the CSE further from the Vale into lower ground near to TB42 which National Grid considered but rejected on the grounds of cost alone. (Which is not in itself consistent with the acceptable reasons set out in NPS-EN5 in the context of a National Landscape). *National Grid's Own Assessment Conclusion* National Grid's Environmental Statement records, at ES Chapter 13, Section 13.7 — Residual Effects, that the	**[APP-359]** and **5.15 Design Development Report [APP-122]**). **5.6 Planning Statement [APP-085]** 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]**.

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			project produces significant adverse landscape and visual impacts on the National Landscape and its setting that are not considered to be adequately mitigated or compensated. This is not a characterisation made by objectors. It is the applicant's own professional conclusion in its own Environmental Statement. This is the same conclusion National Grid reached in their document 'Corridor Preliminary Routeing and Substation Siting Study' of 2022 which detailed extensive and lasting harms to the Dedham Vale in Chapters 5 and 7, the damage due to pylons along the boundaries being considered so significant and the harm so unavoidable that it was better to route through the Vale itself and to reduce infrastructure on the boundary. Whilst infrastructure on the boundary was reduced, the current submissions clearly demonstrate that the reduction has gone nowhere near far enough. *Policy Requirements* NPS EN-5, paragraph 2.11.5, as quoted at ES Chapter 13, Section 13.2.14, states that the general presumption in favour of overhead lines is reversed whenever part of the route crosses nationally designated landscapes to favour undergrounding. That reversed presumption, combined with National Grid's own assessment of significant adverse residual harm, makes the case in the applicant's own words. Importantly the policy does not state 'within' the designated landscape, it focusses on harm 'to' the landscape and further sets out that 'even residual damage is unlikely to be acceptable in planning terms'. This is an intentionally high bar. National Grid have instead focussed on sentences like 'not significant'. That in itself is a matter of opinion. Residents, users and Councils in the area of the Dedham vale have all represented to you the opposite: that the harm will be dramatic, highly significant, and lasting. Important as that is, it remains the case that 'not significant' is greater than 'residual' and even residual is 'unlikely to be acceptable in planning terms'. The tranquillity, the large skies, the Constable viewpoints, the valley approaches, the uninterrupted views from and of thatch or red tile and timber farmhouses — all suffer lasting harm. A 50-metre lattice pylon has an operational life of at least 40 years but those erected in the 1950s are still in operation - some 75 years. The harm is not temporary. It is generational. National Grid should have 'avoided altogether' the National Landscape of the Dedham vale in bringing	

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			forward their proposals. They have demonstrated in their Strategic options Lookback and Review that other routes were possible, as have numerous independent authors including NESO. That they have chosen not to is unfortunate, but not in itself sufficient grounds to override National Policy and recommend approval of this project as submitted. *Remedy* The proper remedy is to reroute entirely. Failing this, undergrounding for significantly greater distance either side of the Vale would be the absolute minimum acceptable solution. Given that the Colne Valley itself is of special quality, any such undergrounding would need to progress beyond Aldham.	
			Suffolk County Council SCC defers to the National Landscape Partnership and endorses its comments. Further, SCC remarks that there will be a lasting change within the cable corridor where trees cannot be replaced.	Noted. Tree and hedgerow removal has been minimised in Dedham Vale National Landscape though the clipping of the Order Limits and restricting the Limits of Deviation in places. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to further reduce removal of trees/hedgerows as far as practicable. This is recorded as commitment GG14 within **7.2 Outline Code of Construction Practice [Revision D]**. Measures to avoid/mitigate impacts to all trees are also a Project commitment: LV05 in **7.2 Outline Code of Construction Practice [Revision D]**. Section 9.4 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** outlines the commitment to reinstate hedgerow field boundaries.
			Jane March & Stephen March The social qualities of the Dedham Vale include the wide-open historic landscapes which are untroubled by modern infrastructure, which industrialisation has not reached, and which remain as they have been over hundreds of years. These views have been captured by artists such as Constable and Gainsborough and are a national treasure. National Grid has demonstrated that their proposed pylons, sealing end compounds and the EACN whilst not build within the vale will be hugely visible from within it. They themselves say that up to 23 pylons will be visible from up to half of the vale and up to 35 pylons in places.	The Applicant has responded to similar landscape and visual concerns raised by Colchester City Council, Great Horkesley Parish Council, Councillor Susie Goldring and Villages Against Pylons; please see the responses provided above.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			This cannot be described as "minor" or "insignificant" damage. It is enormous and will destroy the most social qualities of the vale for all future generations. The route MUST be modified to 'avoid altogether' both the AONB/National Landscape and it's setting as required in planning policy specifically set out to protect it. 'Even residual damage is unacceptable'. We farm at the southern end of the underground section; and after crossing our land the line re-emerges above ground via the Great Horkesley (Tilbury side) Compound which is in fact in Little Horkesley. This is effectively the southern gateway to the protected landscape approaching from Colchester. The compound and associated pylon re-emergence are within sightlines of the National Landscape boundary, introducing industrial structures into the approach corridor and into views looking back into the Vale, and the infrastructure there also being greatly visible from within the Vale along higher ground on both sides of the river. There were very straightforward opportunities to reduce harm here by removing the CSE further from the Vale into lower ground near to TB42 which National Grid considered but rejected on the grounds of cost alone. (Which is not in itself consistent with the acceptable reasons set out in NPS-EN5 in the context of a National Landscape). National Grid's Own Assessment Conclusion National Grid's Environmental Statement records, at ES Chapter 13, Section 13.7 — Residual Effects, that the project produces significant adverse landscape and visual impacts on the National Landscape and its setting that are not considered to be adequately mitigated or compensated. This is not a characterisation made by objectors. It is the applicant's own professional conclusion in its own Environmental Statement. This is the same conclusion National Grid reached in their document 'Corridor Preliminary Routeing and Substation Siting Study' of 2022 which detailed extensive and lasting harms to the Dedham Vale in Chapters 5 and 7, the damage due to pylons along the boundaries being considered so significant and the harm so unavoidable that it was better to route through the Vale itself and to reduce infrastructure on the boundary. Whilst infrastructure on the boundary was reduced, the current submissions clearly demonstrate that the reduction has gone nowhere near far enough. Clearly National Grid have proved themselves that they are wrong in pursuing this route but will not at this stage consider an alternative less harmful route.	

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			Tendring District Council TDC strongly disagrees with National Grid's conclusion that the operational impacts of the Norwich–Tilbury project on the Dedham Vale National Landscape would be "minor" or "not significant". National Grid's own assessment shows that the proposed East Anglia Connection Node and pylons would be visible across approximately 25% of the Dedham Vale, with 11–23 pylons visible from individual viewpoints across 50% of the National landscape ('the landscape') and in some locations up to 35 pylons will be visible in the landscape. This represents a substantial and highly intrusive industrialisation of a nationally protected landscape. It is not credible to describe these effects as minor, negligible, or nonadverse-. The scale, extent, and permanence of the intrusion constitute a clear and significant adverse impact on the special qualities and defining characteristics of the Dedham Vale. It also follows that national policy has not been correctly applied. Under NPS EN-5, nationally designated landscapes such as the Dedham Vale should be "avoided altogether" unless that outcome is demonstrably impossible. The proposed overhead line demonstrably fails this policy test, as avoidance has not been achieved and the resulting harm is plainly significant. For these reasons, TDC firmly rejects the conclusion that operational impacts are not adverse and requests that National Grid's assessment be revisited to reflect the clear and material harm identified in its own evidence.	The Applicant has responded to similar landscape and visual concerns raised by Colchester City Council, Great Horkesley Parish Council, Councillor Susie Goldring and Villages Against Pylons; please see responses provided above.
LV 1.16	The applicant Suffolk CC	**National Landscapes - duty to seek to further the purposes report - 2** Appendix A of the report **[APP-120]** proposes a sum of £2,426,752 to be paid to the County Council to deliver benefits and to enhance the NL and its setting. To both parties: 1. Explain how this sum has been calculated. 2. Give your views on whether this sum should be indexed. 3. Does this sum provide mitigation for the project?	**Dedham Vale National Landscape and Stour Valley Partnership** It is the view of the National Landscape Partnership that this sum would demonstrate the developer's ability to meet the s85 CRoW Act duty on relevant authorities. The calculation was made by identifying a series of projects from the Dedham Vale National Landscape Management Plan 2026 31 that would demonstrate the scheme proposer could meet its s85 CRoW Act duty. The identified projects were then costed as outlined in APP-120 The National Landscape Partnership consider that this sum should be index linked from the time of writing of the APP-120 document The sum is not proposed to provide mitigation for the project but to allow the scheme proposer to demonstrate it is meeting its obligation under the s85 CRoW Act (2000).	The Dedham Vale National Landscape and Stour Valley Partnership's comments in relation to a) and c) are noted and supported. In response to b) the Applicant has updated the Heads of Terms for the legal agreement to include indexation.

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			Suffolk County Council SCC defers to the National Landscape Partnership and endorses its comments. Further, SCC would state in regard to point c that this sum relates to the National Landscape only and cannot be considered to cover the entire/wider project area, not even within Suffolk.	The Applicant notes Suffolk County Council's comments and has responded to the Dedham Vale National Landscape and Stour Valley Partnership's comments above.
LV 1.17	Suffolk CC Essex CC	**National Landscapes - duty to seek to further the purposes report - 3** The Report **[APP-120]** concludes that the mitigation hierarchy has been applied in accordance with national policy. Please confirm whether you agree with this conclusion and provide reasoning if not.	**Essex County Council** High level mitigation hierarchy has been applied to an extent in accordance with national policy. However, the level of mitigation remains to be agreed as set out within the ECC LIR (REP1-161) and the SoCG (REP2-012). ECC request the inclusion of proportionate compensation for a NSIP and would welcome ongoing discussions on this matter.	The Applicant notes the Council's comments regarding the application of the mitigation hierarchy. In terms of the comments regarding mitigation, the Applicant's approach to mitigation including the mitigation hierarchy is set out in **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]** and the **5.6 Planning Statement [APP-085]**. The embedded mitigation is presented in Table 4.2 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and also outlined in paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. This includes measures such as: • Commitment to underground cable in Dedham Vale National Landscape and setting where significant effects on special qualities may occur • Sensitive routeing and siting of the alignment, clipping the Order Limits and restricting the Limits of Deviation to minimise vegetation loss • Trenchless crossing technology • Careful siting of Cable Sealing End (CSE) compounds and the East Anglia Connection Node (EACN) together with landscape planting within associated Environmental Areas • Measures relating to protection of vegetation to be retained and reinstatement of lost vegetation as detailed in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** • Replacement planting (3:1 tree replacement strategy) • Consideration of the materials and colour palette for the CSE compounds and new substations. Standard mitigation measures are outlined in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision D]** and these comprise management activities and techniques which would be implemented to limit effects through adherence to good site practices and achieving legal compliance.

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				Table 5.1 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** details the embedded and standard mitigation measures relevant to the Dedham Vale National Landscape. It is considered that the measures outlined in Section 6 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** provide appropriate, reasonable and proportionate furtherance measures pursuant to the duty. These are being progressed to a section 106 legal agreement with Suffolk County Council as was reported by the Applicant at Issue Specific Hearing 2 and confirmed to be making good progress by the Dedham Vale National Landscape Partnership.
			Chelmsford City Council High level mitigation hierarchy has been applied to an extent in accordance with national policy. However, the level of mitigation remains to be agreed and we request the inclusion of proportionate compensation for a NSIP.	The Applicant notes the Council's comments regarding the application of the mitigation hierarchy. In terms of the comments regarding mitigation, the Applicant's approach to mitigation including the mitigation hierarchy is set out as explained in the response to Essex County Council above.
			Dedham Vale National Landscape and Stour Valley Partnership It is the National Landscape Partnership's view that there is mitigation embedded in the scheme design, that are designed to minimise the impact on the National Landscape, for example siting of the Cable Sealing Ends and proposed undergrounding the cables through the National Landscape. It is noted that national policy (for example Rule 1 of the Holford Rules that states: Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence) dictates that such infrastructure should avoid nationally designated landscapes, such as National Parks and National Landscapes. The National Landscape Partnership consider that the detailed design of the scheme, method of undergrounding, seeking to minimise impacts during construction demonstrates attempts to comply with the mitigation hierarchy but notes that this cannot be fully met as the scheme is not avoiding the National Landscape and impacts will be felt by the National Landscape, hence the need for minimalisation and compensation. The National Landscape Partnership	The Applicant notes the Dedham Vale National Landscape and Stour Valley Partnership's comments. A summary of the Project design and decision making in relation to the routeing choices regarding the National Landscape are contained within 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]**. Full details of the decision making are contained within Section 5.5 of **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** which has been reviewed within the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**). The Applicant also provided a response to LV 1.15 c) in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** which outlined the challenges regarding routeing around the National Landscape.

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			notes that s85 CRoW Act (2000) is still active. Although Government has announced that it is taking forward the recommendations of the Nuclear Regulatory this will require primary legislation to make changes, the National Landscape Partnership is not aware of the timetable for this primary legislation. The National Landscape Partnership notes that even if the legislation is changed the duty will still apply to NSIP developers in relation that they have a duty as a relevant authority to seek to further the purpose of the National Landscape in its decision making.	
			Suffolk County Council SCC defers to the National Landscape Partnership and endorses its comments.	
			Tendring District Council TDC strongly disagrees with this conclusion. National Landscapes have a clearly embedded statutory purpose: to conserve and enhance natural beauty. Public bodies – including decision-makers on NSIPs – have a legal duty to seek to further this purpose when exercising their functions. TDCs understanding of this is that it means: • They must actively consider how their decisions will affect the National Landscape. • They must actively seek avoid harm in the first place and look for opportunities to protect or improve the landscape's special qualities. • They must show clear evidence that they took this duty seriously, not as a tickbox- exercise. In the context of Norwich–Tilbury, this duty means the developer and the ExA must demonstrate that the proposal has been shaped to prioritise the conservation of the Dedham Vale, given its national importance. In terms of the mitigation hierarchy, TDCs understanding is that relevant national policy requires the use of a mitigation hierarchy, which is a structured approach to ensuring National Landscapes are protected. This hierarchy involves three steps, that should be approached in this strict order: Step 1 – Avoidance The first and most important requirement is to avoid harming the National Landscape altogether.	In the context of responding to the mitigation hierarchy point, it is important to note the Section 85 duty does not prohibit development or activities within the National Landscapes, nor does it prohibit development that causes harm to a National Landscape. The core legal framework for decision making on a development consent application remains section 104 of the Planning Act 2008 (please see **5.6 Planning Statement [APP-085]** for further details on the core decision making framework applicable to the application for development consent). Case law supports this interpretation of how the duty operates as detailed in Section 2.2 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. **Campaign for the Protection of Rural England (CPRE) v Secretary of State for Housing, Communities and Local Government [2025**]. This case related to the legal challenge by CPRE to a TCPA decision to permit 165 homes in Kent within a National Landscape. CPRE's case was that planning permission must be refused for any development of land which is found to be in any way harmful to the natural beauty of a protected landscape was rejected. Mr Justice Mould stated, '*The language of section 85(A1) of the 2000 Act imposes no prohibition on the grant of planning permission for development which fails to conserve and enhance the natural beauty of a protected landscape*'. The approach set out by Mr Justice Mould in the CPRE cases '***recognises that in a case where development is found to result in harm to the natural beauty of a protected landscape**, the duty imposed by section*

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			For an NSIP, this means: • choosing a different route, • using undergrounding where appropriate, or • designing the scheme so that the protected landscape is not affected in the first place. This is the strongest and most preferred form of protection – TDC has already evidenced at length and in detail that the applicant was never genuinely interested in choosing a different route that will not affect the national landscape, the using of undergrounding in a small section is completely ineffective ain protecting the national landscape (see our response to the question above and our extensive evidence in TDC LIR). As a result the applicant failed at the first step because they failed to design a scheme so that the protected landscape is not affected. Step 2 – Minimise If harm truly cannot be avoided (and this must be convincingly demonstrated – TDCs position is that harm CAN be avoided), the next step is to reduce the harm as far as possible. Examples include: • lowering structures, • reducing the number of pylons, • screening with topography or planting, or • adjusting alignments. This step is only acceptable once genuine avoidance has been proven impossible. Even if decision makers feel that genuine avoidance has been proven impossible (for the avoidance of doubt TDCs position is that it has not been proven) then the applicant has still failed at this step because TDC has already demonstrated that the exact opposite happened. NG increased the number of pylons along the southern boundary of the National Landscape through its arc dog leg route into the Tendring Peninsula and around the north of Ardleigh, there is no attempt to lower structures, in fact the EACN is located in one of the highest points in Tendring (between 35m and 37m Above Ordnance Datum (AOB)) and within the setting of the National Landscape, screening such a large structure and pylons with planting is impossible and NG has done exactly the opposite of 'adjusting alignment' – they are deviating from their prevailing project route causing even MORE harm to the National Landscape.	*85(A1) of the 2000 Act requires certain matters to be addressed by planning decision-makers. It is an approach which is essentially reflected in the guidance issued by DEFRA in December 2024*'. He said matters should be expressed in terms of weight, and that the '**duty does not and is not intended to displace the established evaluative character of the determination of planning applications**, which arises from the long-established principles that govern such decisions under sections 70 of the 1990 Act and 38(6) of the 2004 Act'. The duty to seek to further the purposes is also reflected in National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) and the newly published 2025 versions. The NPSs similarly do not prevent all development within the National Landscape which may have an adverse effect. Paragraph 5.10.32 of NPS EN-1 recognises the urgent need for energy infrastructure and seeks to balance this against the protection of National Landscapes in the exceptional circumstances test. **5.6 Planning Statement [APP-085]** considers this test and outlines how the Project is compliant. Paragraph 5.10.7 of EN-1 states: '*For development proposals located within designated landscapes the Secretary of State* ***should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development***'. In terms of the mitigation hierarchy, the Applicant disagrees with the comments made by Tendring District Council and considers the mitigation hierarchy has been appropriately applied. **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]** outlines the approach taken to mitigation and the application of the mitigation hierarchy – avoid, prevent, reduce, offset. In regard to the first step, 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**

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			Step 3 – Mitigate / Compensate If some residual harm still remains, the final step is to mitigate or compensate for it. This might involve: • landscape enhancement projects, • habitat creation, or • funding improvements within the National Landscape. TDCs position is that the applicant has not met the requirements of Step 1 (avoidance) or Step 2 (minimisation). Because the proposal has not been redesigned to avoid or meaningfully reduce harm to the Dedham Vale, reaching the compensation stage is purely academic. Furthermore, even if Step 3 were engaged, no amount of mitigation or compensation could offset the scale, intensity, or permanence of the individual and cumulative harm this project would cause to a nationally protected landscape. Compensation cannot legitimise avoidable harm, nor can it remedy the fundamental conflict between the proposal and the statutory purpose of the Dedham Vale.	**the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**). Contrary to the comments, the Project includes use of underground cables in the Dedham Vale National Landscape and setting where significant effects on special qualities may occur, in addition to the following to avoid impacts: • Sensitive routeing and siting of the alignment, clipping the Order Limits and restricting the Limits of Deviation to minimise vegetation loss • Trenchless crossing techniques have been adopted in specific locations to seek to retain areas of trees and woodland • Order Limits have been restricted in certain locations to minimise vegetation loss • Careful siting of Cable Sealing End (CSE) compounds and the East Anglia Connection Node (EACN) together with landscape planting within associated Environmental Areas • Measures relating to protection of vegetation to be retained and reinstatement of lost vegetation as detailed in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. The Applicant disagrees with the Council's view that '*the Applicant failed at the first step because they failed to design a scheme so that the protected landscape is not affected*'. The reasoning why avoidance of the National Landscape has not been progressed has been outlined previously (references to documents provided above). The Applicant also provided further explanation in relation to this matter in response to written question LV 1.15 in the **8.9.1 Applicant's Response to First Written Questions [REP3-074]**. The next steps in the mitigation hierarchy are then considered – prevent and reduce. Section 5 and Table 5.1 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** detail the mitigation provided. Mitigation measures have also been outlined in Table 6.1 of the **7.2 Outline Code of Construction Practice [Revision D]**. The approach the Applicant has taken is also compliant with the Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes published

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				by Defra in 2024[19]. The Project has carefully considered and met the section of the guidance on 'What a relevant authority should do' which includes '*as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes'*. In addition to this the guidance requires '*A relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes'*. The first steps in the mitigation hierarchy have been followed. The additional measures provided pursuant to the mitigation hierarchy and to seek to provide furtherance pursuant to the section 85 statutory duty have been detailed in Section 6 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. The Applicant is progressing the Heads of Terms for the legal agreement to secure the measures with the National Landscape Partnership and Suffolk County Council. It is hoped these will be agreed shortly as was reported at Issue Specific Hearing 2 (ISH2) by the Applicant. The National Landscape Partnership confirmed at ISH2 that good progress is being made.
LV 1.20	The applicant	**Holford rules** Holford Rule No 6 states that in a county which is flat and sparsely planted, keep high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'. Is there a risk that in following such a rule the adverse landscape effects of OHLs and pylons are in fact spread out over a larger area and maximised (particularly in generally flat countryside) instead of concentrating harm along corridors?	**North-West and South-West of Chelmsford Parishes Group** In Written Question LV1.20, the ExA asks the Applicant: Is there a risk that in following (Holford Rule 6) the adverse landscape effects of OHLs and pylons are in fact spread out over a larger area and maximised (particularly in generally flat countryside) instead of concentrating harm along corridors? The Parishes Group has the following comments on this question at this stage: 1. The Group strongly agrees that there is a significant risk. This is illustrated in the Chelmsford area, where a completely new corridor of adverse landscape effects is proposed to the north and west of Chelmsford in addition to the existing corridor to the east of the City. 2. Unless more efficient use of an existing corridor is completely infeasible from a technical perspective, the Group questions how creating a new corridor of adverse effects is compatible with the legal duty of	The Applicant notes the Group's comments. The Applicant has been clear about its approach to the Holford Rules when making decisions on routeing in its response to the Written Question in **8.9.1 Applicant's Response to First Written Questions [REP3-074]**. In relation to the alternative corridor proposed by the Group, the Applicant has responded with justification as to why this route is not preferred each time it has been raised – please refer to the response to the North-West and South-West of Chelmsford Parishes Group in **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [Revision A]**.

[19] Department for Environment, Food and Rural Affairs (Defra) (2024) *Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes*

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			network operators under the 1989 Electricity Act to: a) have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and (b) (operators) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. Unless it can be shown that the landscape within a proposed new corridor is already significantly degraded, and that it has no relevant features of interest, it is self-evident that the creation of a new corridor will lead to greater adverse impacts on the preservation of natural beauty overall. Choosing the least harmful route is a key part of mitigating effects on the natural beauty of the countryside. 3. Dispersing routes can remove positive opportunities to rationalise existing lines. In areas like east of Chelmsford, where an existing lower voltage line already parallels an existing high voltage line, the pylon and cable heights and the distances between pylons are likely to differ between the two lines, creating a more fragmented and confusing appearance. If there is the opportunity to replace a lower voltage line with a higher voltage line, it may be possible to improve upon the status quo. This is alluded to in the Note to Rule 6 which says: Arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance; 4. NPS EN-5 also states that the principal ways of mitigating potential adverse landscape effects include: '*The rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development.*' (Para 2.10.5, December 2025 version). This clearly indicates that simply avoiding existing lines by creating new transmission corridors should be a last resort in planning new networks, appropriate only where rationalisation, reconfiguration and/or undergrounding are impossible. 5. Therefore, the Group also believes it is essential that initial assessments include scenarios both with rationalisation and without, wherever rationalisation is possible. Otherwise, it is difficult to assess landscape effects clearly and accurately as it's unclear which effects would be satisfactorily mitigated by line	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			rationalisation and which would not. For instance, re: Chelmsford area, the **Topic Baseline Overview for the Corridor L section (Appendix D, CPRSS Appendices, p. D18-22) [REP1 068]** does not distinguish clearly between these scenarios, making this section of the document of limited value for decision making. Finally, other Holford Rules also need to be applied and balanced to gain a full picture. For instance, Holford Rules 4 and 5 would suggest the desirability of a route east of Chelmsford, alongside the existing power lines, with rationalisation of lower voltage lines deployed to make this possible. In this situation, creating a new different corridor is clearly not appropriate. In other situations, of course, the balance of consideration of the Holford Rules as a whole might be different.	
LV1.22	All local authorities	**Landscape visualisations – 1** The local authorities are asked whether: • You agree with the viewpoints in the visualisations **[APP-343]** to **[APP-349]** chosen to reflect any potential impacts on landscape. • In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?	**Mrs Margaret Podd** In addition to Viewpoint 2.43, there should be a visualisation from properties in Saxham Street, Stowupland looking east towards the pylons, and also from properties in Blacksmiths Lane, Middlewood Green, Earl Stonham looking west towards the pylons, so that the visual impact of the pylons from residents' homes in an acknowledged narrow corridor (see below) can be better understood. When assessing visual impacts for residents, the views from upper floor windows of homes needs to be considered, particularly with the increase in working from home and the likelihood that the workspace will be on an upper floor. There is an acknowledgement by NG that the corridor at this point is restricted (ref below). Such areas should be a priority for low pylons/T-pylons. NG has acknowledged that this section is suitable for T-pylons (covered in my registration comments): Ref: EN020027-001548-7.18 Errata 2022 - Corridor and Preliminary Routeing and Siting Study Appendices.pdf (page 21) (Accessed 08/03/26) Section D Visual effects are likely to be experienced by residents of Gislingham, Saxham Street, Stowupland, Creeting St. Peter and of the smaller settlements and farmsteads within and close to the corridor. In the vicinity of Saxham Street the corridor is restricted to a width of ~350m between residences, meaning that the line would have to pass within ~175m of residences. Recreational visual receptors who may experience effects are mainly restricted to users of the local PRoW network and users of National Cycle Network National Route 51	The Applicant notes the request relating to additional viewpoints at Saxham Street and Middlewood Green. The landscape and visual viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The Applicant considers that close and medium distance views towards the Project within this area are represented by Viewpoint 2.12 Mid Suffolk Footpath / Gipping Road, west of Saxham Street (see PDF pages 47 to 51 of **7.12 Visualisations - Part 2 of 9 [APP-344]**) and Viewpoint 2.43 PRoW, Middlewood Green (Earl Stonham 8) (see PDF pages 32 to 36 of **7.12 Visualisations - Part 3 of 9 [APP-345]**). Effects on residents, recreational visual receptors along local Public Rights of Way (PRoWs) and the National Cycle Network, including around Gislingham, Saxham Street, Stowupland and Creeting St Peter are considered in Visual Receptor Area (VRA) B6 and VRA B4 within paragraphs 13.5.37 to 13.5.72 in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant effects on visual receptors are identified within approximately 1.5 km of the Project. The conclusions of the Landscape and Visual Impact Assessment will not change as a result of adding new assessment or illustrated viewpoints. The Applicant has provided a response on the use of T-pylons in DES 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				Residential visual amenity impacts are assessed in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA), the purpose of which is to determine whether the Project may give rise to any breaches of the Residential Visual Amenity Threshold (RVAT), in accordance with Landscape Institute Guidance Note 2/19 Residential Visual Amenity Assessment[20]. Wireline visualisations for each of the properties which fall within the RVAA Study Area (of 200 m either side of the Project centreline) are presented in Annex A of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**. Of the locations mentioned, only one property falls within the RVAA Study Area: Owls Farm at Middlewood Green (property ref. B11). Beyond this Study Area, effects are not anticipated to be so great that the RVAT is likely to be breached, therefore, in the context of this assessment, no other specific visualisations have been deemed necessary for properties at Saxham Street, Blacksmiths Lane, Middlewood Green or Earl Stonham.
			Essex County Council ECC would request further visualisations locations beyond the 3km study area where appropriate; particularly for example (around valley landscapes such as Feering) and areas identified within the ZTV. These requests have been set out in the submissions made to this Examination to date, including the LIR (REP1-161).	The Applicant notes the request relating to additional viewpoints beyond the 3 km Study Area. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** and Table A13.1.1 LVIA Study Area of **6.13.A1 Environmental Statement 13.1 Landscape and Visual Methodology [APP-227]**. Viewpoints are largely contained within the 3 km Study Area; however, some more distant viewpoints up to 5 km from the closest above-ground infrastructure were considered (Viewpoints 3.20, 3.24, 3.26, 3.27, 5.01, 6.12, 6.22, 6.25 and 8.09). No significant effects were identified at any of these viewpoints.
			Brentwood Borough Council BBC agrees with the viewpoints in the visualisations that have been chosen to indicate potential impacts on the landscape but considers that given the extended linear nature of the proposal that further visualisations should be provided to offer a much broader scope of the visual impact, including from locations beyond the 3km study area where appropriate.	
			Chelmsford City Council Information on the acceptability of the viewpoints and the need for additional visualisations has been provided within CCC's LIR (REP1–153) Generally, the viewpoint assessments are welcomed, but there are still considerable gaps in the provision including VRA F9 Edney Common (Longer distance) and VRA F6 Chelmsford North-West (Longer distance) The	The Applicant's response is set out under ID 8.418-8.425 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

[20] Landscape Institute (2019) *Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network in particular. Further visualisations have been requested from locations beyond the 3km study area where appropriate and areas identified within the ZTV.	
			South Norfolk District Council South Norfolk District Council (together with Norfolk County Council) responded to the proposed viewpoints within Section A as part of the pre-examination process. Some adjustments were made in response to comments made. South Norfolk District Council is not in a position to propose any additional viewpoints at this time but is happy to review any required by the Examining Authority.	Noted.
			Colchester City Council CCC disagree that sufficient or appropriate viewpoints have been demonstrated. Within our LIR (REP1-156) we note the need for several additional viewpoints which are listed in paragraph 12.109. None have been chosen which detail the degree of harm illustrated clearly on the reverse viewfall diagrams.	The Applicant's response is set out under ID 12.109 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant wishes to clarify that the reverse Zone of Theoretical Visibility (ZTV) contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** (Figure A13.5.3), does not represent theoretical visibility of the Project from the National Landscape. The mapping was undertaken as a theoretical exercise to aid the understanding of potential visibility from the National Landscape as a whole, irrespective of the Project. This helped inform consideration of setting and the assessment of effects on the special qualities of the National Landscape, in combination with analysis of Project-specific ZTVs and extensive field based observations. Further detail about the reverse ZTV is provided in paragraphs A.5.42 to A.5.49 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Figures A13.5.6 to A13.5.12 contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of discrete sections of the Project that fall within 5 km of Dedham Vale National Landscape. It is important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. In addition, ZTVs only take the main blocks of woodland into account, modelled at a height of 15 m. They do not consider hedgerows,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				individual or field trees, so overstate potential visibility, which will be reduced in practice.
			Thurrock Council The Council consider that there are limited public viewpoints close to the route, meaning that visual effects will be limited along much of the route. A visualisation is provided from the footpath running through the golf course (Viewpoint 8.11: PRoW near Southfields (No 42)), however, this is at some distance from the Order Limits. This path (footpath 45 at this point) also runs along the northern boundary of the Order Limits at the Tilbury North Substation. A visualisation from this path closer to the Order Limits / Tilbury North Substation location is required. No cumulative visualisations have been provided. In the case of the Tilbury North Substation and Lower Thames Crossing they will be seen in conjunction with each other and cumulative visualisations should be provided.	The additional comments from Thurrock Council have been considered. The Applicant confirms that Viewpoint 8.11 is approximately 250 m from the nearest operational above ground structure of the Project. With regard to distance from the Order Limits, this viewpoint is approximately 35 m from the Order Limits associated with permanent right of access to pylon TB262, and 165 m from the Order Limits related to the construction of the overhead line. Lower Thames Crossing (LTC) published baseline photography and photomontages for Deadline 9 of their Development Consent Order Examination. This included LTC Viewpoint N-17 which is a view from footpath 45 located within Orsett Golf Course. The baseline photography and photomontages are illustrated on pdf pages 29 to 36 of LTC Deadline 9 Submission 6.2 Environmental Statement Figure 7.19 - Photomontages Winter Year 1 and Summer Year 15 (3 of 4) v2.0. The LTC Deadline 9 Submission 6.3 Environmental Statement Appendices Appendix 7.10 – Schedule of Visual Effects (pages 145 and 146) reported Moderate Beneficial effects in views from LCT Viewpoint N17. An assessment of visual effects of the Project in the vicinity of Tilbury North Substation has been undertaken based on consideration of views experienced from Visual Receptor Areas (VRAs) H3 Orsett and H7 Linford as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. This was cross referenced to and supplemented by viewpoint assessments including Viewpoint 8.11: PRoW near Southfields (No 42). It is important to note the assessment is based on first hand observations during site visits and not on viewpoints and visualisations alone. Significant visual effects are reported up to 1.5 km from the Project within VRA H3 Orsett and VRA H7 Linford and also in relation to Viewpoint 8.11. The Applicant has also reported significant cumulative visual effects within VRA H3 Orsett and VRA H7 Linford due to the introduction of new road infrastructure and the Norwich to Tilbury project occurring alongside each other. This is set out in Table A17.3.1 of **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**. The Applicant has considered the request for an additional viewpoint adjacent to the proposed Tilbury North Substation together with cumulative

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				photomontages. The Applicant does not consider an additional viewpoint or cumulative photomontages necessary for assessment purposes as this would not change the assessment.
			Braintree District Council The Council were content with the locations chosen for landscape visualisations. However, concerns still remains around the limits of deviation (as per question Alt 1.9) and whether these visualisations should include the reasonable worst case in their pylon positioning.	Visualisations were prepared to represent the Project design as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and illustrated on **2.3 Works Plans - Sections A and B [APP-017 and APP-018], Section C [Revision B], Sections D to G [APP-020 to APP-023] and Section H [Revision B]**. This is representative of a reasonable worst-case scenario, in line with the Rochdale Envelope principles as described in Section 4.6 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The Limits of Deviation (LoD) allow for flexibility in the Project design which is unlimited longitudinally, and limited to 50 m laterally and 6 m vertically (see **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** Section 4.5 and Table 4.3). It is the expectation that the Project will be built as per **2.3 Works Plans - Sections A and B [APP-017 and APP-018], Section C [Revision B], Sections D to G [APP-020 to APP-023] and Section H [Revision B]** unless movements are needed, for example to respond to factors such as ground conditions and to allow for value engineering. As such, what is shown represents a **reasonable** worst case. Potential changes within the LoD were considered through sensitivity testing as set out in Section 13.9 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The Applicant concluded that there would be no change to the significance of landscape and visual effects as a result of movements within the LoD. It would not be reasonable or realistic to illustrate a project whereby all pylons were at the outer edge of the LoD, or say 6 m higher. In addition, theoretically, there could be an infinite number of permutations to show in visualisations which again is wholly unrealistic. It is also noted that if a pylon was moved up to 50 m closer to one receptor, it may also move up to 50 m further away from another receptor, so it could be considered worst case in one respect and best case in another. Visualisations are one of the tools used to help an assessor and decision maker understand the nature of effects, but are used in combination with extensive desk- and field-based studies, examination of Zone of Theoretical Visibility (ZTV) maps and other materials to help understand the nature of the change proposed.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				An assessor considers the potential for variations in making their judgements, just as they consider the way people move around a locality, variation in weather and seasons, variations in the management regimes for hedgerows and so on. Judgements are not determined by visualisations, which are from single points at a particular moment in time, and should be considered as examples of what views may look like, not an absolute representation.
			Babergh and Mid Suffolk District Council Further visualisations have been requested from the most sensitive locations beyond the 3km study area where appropriate; particularly for example in areas identified within the ZTV where the visual envelope goes beyond the 3km area. In addition, to fully understand the effectiveness of mitigation, some sensitive locations, should be reviewed as a standalone LVIA. Furthermore, once the visual impact has been reviewed, an environmental colour assessment (ECA) should inform a comprehensive Design Code, addressing planting and materiality appropriately, specifically: i. Waveney Valley/Wortham Ling and the alignment of proposed pylons (the route follows an acute alignment west to east, creating a very impactful visual intrusion. ii. Mellis Common and the impact on the Mellis Common nature reserve. (Consideration also with the EcoPower cumulative impact.) iii. Gipping Valley/Badley and the alignment of the pylon route. iv. Offton and the cumulative impact of the compound. Bramford and the cumulative impact (multiple NSIP junction point).	The Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and supporting appendices considers the potential effects of the Project as a whole and therefore standalone LVIAs are not considered necessary. The provision of stand-alone LVIAs for certain areas would not change the outcomes of the LVIA. Locations beyond 3 km will not illustrate potential significant effects, based on the fact that no significant effects have been identified beyond 2 km distance from the Project. Whilst they may illustrate further non-significant effects at greater distances, it is not a requirement of Environmental Impact Assessment or the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)[21] to illustrate every potential effect. The fact that infrastructure may be seen (as shown on a Zone of Theoretical Visibility (ZTV) map) does not mean that the visual effects will be significant, especially at greater distances when filtering or screening by layers of vegetation comes into play, and given the apparent scale of the infrastructure is reduced because of the effect of perspective. **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** sets out information on colours and materials at Section 3.4. It explains the Approval Process at Section 6.2, and introduces the various Requirements including mechanisms for Local Planning Authorities to input to these. With regard to the last point, an updated cumulative assessment is being prepared for submission at Deadline 4.
			Suffolk County Council SCC considers that it would be difficult for the Applicant of a linear and tall project such as this to provide	Visualisations are intended to be representative, as noted. It would not be possible or proportionate to seek to illustrate every effect. This is recognised in the

[21] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			visualisations reflecting any potential impacts on landscape, other than in a representative manner. SCC welcomes the additional visualisations, which have been supplied for Mellis and the Waveney Valley. However, the overall density of viewpoints along the route alignment remains sparse. SCC would have welcomed, if there could have been two or three visualisations (or at least one) from key viewpoints for each a elected parish to help local communities understand the level of impact of the scheme on their locality. SCC provided the Applicant with detailed comments on viewpoints during pre examination stage (APPENDIX 2). Given the latest proposals to cross the Waveney Valley with pylon towers rather than undergrounding the power line, and given the sensitivity of the area, I consider that additional viewpoints are required from within the Waveney Valley, for example from two viewpoints on the PROW, looking along the valley in either direction, and from Wortham Ling to appropriately represent and assess the expected changes to the landscape and effects on visual receptors.	Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)[22]. The Applicant notes the comment regarding the additional visualisations which were provided at Mellis and in the Waveney Valley. The Applicant notes the request for further viewpoints within the Waveney Valley; however, it considers that views from Public Rights of Way / the Angles Way are represented by Viewpoints 1.14, 1.19, 1.21 and 1.22, and views from Wortham Ling are represented by Viewpoints 1.22 and 2.01. A very large number of illustrations are provided already (photomontages and wirelines to accompany the Landscape and Visual Impact Assessment, the heritage assessment and the Residential Visual Amenity Assessment). The provision of further visualisations would be disproportionate and would not change the outcomes of the assessment. Visualisations are not provided to illustrate the effects of undergrounding, given the limited infrastructure that would be present in the views (link pillars), and the fact that the majority of the effects of undergrounding would be short to medium term. The viewpoints were discussed with consultees albeit that not every location that was requested could be taken forward as part of the assessment.
			Tendring District Council TDC does not agree that the viewpoints selected in visualisations **[APP343]** to **[APP349]** adequately represent the potential landscape and visual impacts of the Norwich to Tilbury proposal. The chosen viewpoints are highly selective and do not reflect how largescale infrastructure of this magnitude is actually experienced in the landscape. The East Anglia Connection Node, the high pylons curving around the north of Ardleigh, the future North Falls and Five Estuaries wind farm connections and substation, and associated haul routes, compounds, and largescale ground clearance works necessary to facilitate all of this will never be experienced as still, narrow field snapshots. They are experienced continuously, panoramically, and repetitively, with multiple pylons and structures visible in sequence across wide views and from numerous publicly accessible locations. The current viewpoint set fails to communicate that reality. In particular:	The approach to selecting the Landscape and Visual Impact Assessment (LVIA) viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 **[REP1-010 to REP1-032]**). The viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment and wirelines from the closest residential properties to the Project. The technical visualisations in **7.12 Visualisations - Parts 1-3, 5-6 and 8 of 9 [APP-343 to APP-351] and Parts 4, 7 and 9 of 9 [Revision B]** were prepared in

[22] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			The visualisations do not capture the scale, density, or extent of the proposed pylons around Ardleigh. The images do not convey the true degree of landscape industrialisation that would occur, especially given the cumulative infrastructure context. Critically, none of the selected visualisations illustrate the impacts revealed in the applicant's own reverse view fall diagrams, which demonstrate far greater visibility than the chosen viewpoints imply. As a result, the submitted visualisations materially under-represent the magnitude of adverse landscape and visual effects, particularly within highly sensitive areas and along key public routes. Additional visualisations are therefore required. At minimum, these should include: • Panoramic, 360degree viewpoints from key publicly accessible locations within and adjacent to the Dedham Vale National Landscape. • Additional viewpoints around Ardleigh, capturing the full spread of visible pylons and associated infrastructure. • Sequential route based visualisations (e.g., along footpaths, bridleways, public highways) that show how the infrastructure is experienced in motion. • Viewpoints aligned with the reverse view fall analysis, illustrating the highest concentration of visible structures. Only with a more representative and comprehensive set of visualisations can the true nature, scale, and severity of visual harm be accurately understood.	accordance with Landscape Institute Technical Guidance Note 06/19 Visual representation of development proposals[23]. The visualisations are accurate, objective and unbiased. The Applicant acknowledges that there are limitations to the visualisations as they are static images and cannot represent the experience of moving through the landscape, including at different times of day, in different weather or seasons. The assessment was informed by a number of tools, including extensive travel throughout the Study Area, desk based research and study of maps, plans and Zones of Theoretical Visibility (ZTVs). Although partly informed by them, it was not based on the visualisations. Additional visualisations would not change the outcomes of the LVIA. It is considered that reasonable 'worst-case' views from Ardleigh are represented by Viewpoint 3.11 PRoW north of Ardleigh (Ardleigh 2) as shown on PDF pages 120 to 126 of **7.12 Visualisations - Part 3 of 9 [APP-345]**. Outline parameters for North Falls and Five Estuaries Substations are shown in relevant visualisations, including at Viewpoint 3.11. In addition to this, the Applicant notes that cumulative visualisations were provided by Five Estuaries and North Falls (see Action Point 35 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points submitted at Deadline 4**) The methodology for the ZTV mapping is set out in Section 13.6 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. The ZTV is a starting point for understanding the theoretical visibility of the Project. Woodland blocks were modelled into the ZTVs, using the National Forest Inventory dataset. The ZTVs do not account for the additional screening and filtering effects of hedgerow and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area. The Applicant wishes to clarify that the reverse view fall analysis referred to is the reverse Zone of Theoretical Visibility (ZTV) contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** (Figure A13.5.3). This does not represent theoretical visibility of the Project from the National Landscape. The mapping was undertaken as a theoretical exercise to aid the understanding of potential visibility from the National

[23] Landscape Institute (2019) *Technical Guidance Note (TGN) 06/19 Visual representation of development proposals*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				Landscape as a whole, irrespective of the Project. This helped inform consideration of setting and the assessment of effects on the special qualities of the National Landscape, in combination with analysis of Project-specific ZTVs and extensive field based observations. Further detail about the reverse ZTV is provided in paragraphs A.5.42 to A.5.49 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**.
LV 1.26	Babergh DC Mid Suffolk DC Suffolk CC	**Babergh DC, Mid Suffolk DC and Suffolk CC's Local impact report - 2** Your **LIR [REP1-178]** states that there is only one viewpoint outside of 3km in Suffolk and that potential exists for more than this. Please provide further information over possible locations.	**Babergh and Mid Suffolk District Council** • Area around Elmsett, FP W-233 018/0 (particularly with regards to the Substation) • Area around Micksfield, FP E-495 002/0; E-495 038/0; BW W-555 055/0 • Area around Aldam Priory, FP W-318 002/0 • Area around Little Finborough, FP W-198 081/0 **Suffolk County Council** SCC has provided the Applicant with comments on viewpoints in January 2025 (APPENDIX 2), which also contain suggestions for additional viewpoints. With regards to viewpoints beyond 3km, SCC considers that west of the route, additional viewpoints would be useful between Bacton Green and Haughley Green, looking south west (VRA B4 Finningham and Gislingham, page 4 of Figure 13.7 **[REP1-066]**); from Jack's Lane, west of Coombs south of Boyton Hall, looking north-east (VRA B8 Stowmarket, page 4 of Figure 13.7 **[REP1-066]**); east of Battisford Tye, from Straight Road, west of Stowmarket Road, looking north-east and south-east (VRA B10 Great Bricett, page 5 of Figure 13.7 **[REP1 066]**); from New Road, south-east of Naughton, looking north-east, east, and south east (VRA B12 Elmsett, page 5 of Figure 13.7 [**REP1-066]**). East of the route, SCC would welcome additional viewpoints from Dial Cottage at Coddenham Green, looking west, (east of VRA B 9 Needham Market, page 4 of Figure 13.7 **[REP1-066]**); from Thwaite Road, south-west of Thorndon and south of Five Cross Ways, looking south-west (VRA B5 Wickham Skeith and Mendlesham, page 5 of Figure 13.7 **[REP1-066]**).	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** and Table A13.1.1 LVIA Study Area of **6.13.A1 Environmental Statement 13.1 Landscape and Visual Methodology [APP-227]**. Viewpoints are largely contained within the 3 km Study Area; however, some more distant viewpoints up to 5 km from the Project were considered, including the following within Suffolk: • Viewpoint 3.20 Fenbridge Lane (4.2 km) • Viewpoint 3.24 Higham Hill, south of Lower Raydon (4.2 km) • Viewpoint 3.27 B1066 Park Road, near Thorington Street (4.8 km). Additional viewpoints would not change the outcome of the Landscape and Visual Impact Assessment (LVIA).
LV 1.27	Norfolk CC	**Norfolk CC LIR** In your **LIR [REP1-173]** you note several concerns/outstanding objections to landscape and visual matters.	**Norfolk County Council** With regard to paragraph 11.2, we are not satisfied by the applicant's D1 and D2 responses. In the applicant's comments on the **LIRs [REP2-030]** between paragraphs 3.13.11 to 3.13.16 the applicant maintains that a 5-year aftercare period for replacement trees is appropriate. The	The Applicant notes Norfolk County Council's comments regarding the aftercare period but does not agree that an extended aftercare period is required solely as a result of the landscape and visual effects identified within the Environmental Statement. A five year aftercare period is a typical time period used in large scale infrastructure projects. The failure rate for native tree and shrub

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Regarding the applicants D1 and D2 responses are you satisfied with the responses received to the questions you raised in: • Paragraph 11.2 (aftercare period for reinstatement planting and detailed monitoring)? • Paragraph 11.2 (additional compensation and landscape led restoration projects within the Waveney Valley)? • Paragraph 10.8 (construction near water courses)? • Paragraph 10.9 (insufficient definition of temporary construction works)? If not, please indicate in full areas that you still consider require addressing.	applicant doesn't engage with NCC's concerns that the substantial and widespread landscape and visual impacts of this project are of such magnitude that they justify a longer period to ensure the success of mitigation planting. We note the applicant's comments about the adaptive nature of the aftercare commitment and we suggest that the detailed monitoring approach we are advocating would be suitable within an adaptive approach. NCC maintains it position on the need for additional compensation and landscape led restoration projects within the Waveney Valley. The applicant notes in paragraph 3.5.17 of their comments on the LIRs that there is not an expectation for all residual effects to be compensated for. NCC agrees that not all residual effects can be compensated, but as explained fully in our **LIR [REP1-173]**, the NPS does require application of the mitigation hierarchy, which includes compensation. NCC submit that the great sensitivity of the Waveney Valley and the widespread and substantial impact on it by the project requires a more thoughtful and proactive application of the mitigation hierarchy than is currently the case. As a reminder, because there is no embedded mitigation in the form of undergrounding, no additional mitigation beyond standard measures are proposed (see section 13.6 of **ES Chapter 13 [APP 226]**). The LLFA are not currently satisfied with the responses received regarding paragraphs 10.8 and 10.9. Norfolk LLFA has recently been provided with a Drainage Strategy by the applicant that contains some incomplete and erroneous information. This combined with the incomplete information in Chapter 4 and 12 of the Environmental Statement leaves the LLFA insufficient information to determine whether the temporary construction works including the supporting surface water drainage will result in an increase in flood risk from the proposed development or whether there is sufficient mitigation and management measures in place near watercourses. Further information is required from the applicant and detailed comments and feedback on the drainage strategy provided to the applicant.	planting falls off rapidly after the first c.2–3 years, at which point most plants tend to be becoming well established, following their movement from the nursery and replanting at the site. Appropriate embedded and standard mitigation measures have been proposed to reduce the adverse effects of the Project within the Waveney Valley, in accordance with the mitigation hierarchy. This includes sensitive routeing and siting of pylons, reinstatement of habitats removed during construction and the 3:1 tree replacement ratio. Whilst there are locations within the Waveney Valley where views of the overhead line would extend into more elevated surrounding rural areas that lie to the north and south of the Waveney Valley, intervening landform, vegetation and settlement would screen/filter some sections of the overhead line and limit more distant views. Effects within the lower-lying valley floor and lower valley sides would be generally at least partially contained by the landform and vegetation. Landscape and visual effects beyond approximately 1.5 km are therefore generally judged to be not significant. The Applicant's position is that the findings of the Landscape and Visual Impact Assessment (LVIA) demonstrate that there is not a high potential for widespread and significant adverse landscape and/or visual impacts at the Waveney Valley. The Applicant maintains its position in relation to the requirement for landscape compensation which was most recently set out in Issue Specific Hearing (ISH) 2 and **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]** submitted at Deadline 4. Notwithstanding this, the Applicant sought and received further information in relation to the request for compensation at the Waveney Valley area and is currently reviewing this information. The Applicant has engaged with Norfolk County Council Lead Local Flood Authority (LLFA) to discuss the comments raised within the Local Impact Report and the comments received on **8.2 Drainage Strategy DCO [Revision B]**. In order to address the concerns raised, the Applicant is updating the Drainage Strategy to provide additional information and clarity on certain aspects of the outline drainage designs, including those serving temporary construction works. The updated Strategy will be submitted to the examination at Deadline 4.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
LV 1.28	The applicant	**Coordinated masterplans** In their LIR, Babergh DC, Mid Suffolk DC and Suffolk CC **[REP1-178]** request that coordinated masterplans be produced covering landscape, ecology, archaeology and rights of way in highly affected areas – suggesting that plans are produced for Bramford, Burstall and the Gipping and Waveney Valleys. The ExA consider there is merit in this request and ask that coordinated masterplans are produced for the following areas, and that built heritage is also included in the plans: • Gipping Valley • Waveney Valley (including Snow Street, Roydon, Roydon Fen and Wortham Ling) • Burstall & Bramford • Ardleigh & Little Bromley • Colne Valley (including Fordham, Ford Street, Aldham) • Great & Little Waltham • Ingatestone & Buttbury • Hutton/ Mountnessing/ Havering's Grove	**Chelmsford City Council** CCC welcome the request for a masterplan to be provided for Great and Little Waltham and ask that it is consulted on this, together with other stakeholders. CCC queries how the masterplan would be enforced / used? Could a requirement be created to ensure that details are submitted to CCC for review and consideration and the works are carried out in accordance with the masterplan /any other variations?	The Applicant notes the response. A response in relation to coordinated masterplans was provided in reference LV 1.28 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]**. However, the Applicant notes Action 27 issued by the Examining Authority during Issue Specific Hearing 2 which is being considered as set out in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]**.
LV 1.30	The applicant	**Outline landscape and ecology management plan** Respond to the following queries regarding the outline LEMP [AS-046]: 1. Provide clarification on tree and vegetation protection during pre-commencement works. 2. Will the mitigation hierarchy for veteran trees be agreed with relevant local authorities? 3. Provide further detail regarding minimised working widths for the protection of hedgerows. a) Where works are temporary will traffic management be utilised instead of tree/vegetation removal? (for example in instances of low visibility for haul road junctions). If so, how would this be controlled and secured? b) Provide further detail and definition of any potential nighttime working and attendant lighting measures.	**Holton St Mary Parish Council** Holton St Mary Parish Council reemphasises the need for National Grid's night-time works; including construction/storage depots and workers' and cable sealing compounds etc and the lighting thereof to comply with National Landscape advice on Dark Skies lighting (https://coastandheaths-nl.org.uk/2023/08/07/new-landscape-lighting-design guide- published/). HSM is less than a mile from the National Landscape and at higher altitude, so light pollution is a serious concern that National Grid appears not to have addressed.	The Applicant has provided a list of pre-commencement activities within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. It is expected that there will be a reduction in vegetation loss through careful siting of temporary works and compounds to reduce the impacts to existing vegetation. Commitments in **7.2 Outline Code of Construction Practice [Revision D]** that seek to minimise impacts to vegetation include, for example commitment B13 which states '*There will be a refinement post-consent, that within the provisions of the* [**7.4 Outline Landscape and Ecological Management Plan [REP3-030]**] *aims to further reduce vegetation losses prior to pre-commencement*'. The Applicant has provided a mitigation hierarchy for veteran trees in Table 7.1 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. The final Landscape and Ecological Management Plan must be substantially in accordance with the Outline Landscape and Ecological Management Plan, as per paragraph 1(c) of Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
LV 1.34	The applicant All local authorities	**ES Appendix 13.6 – arboricultural impact assessment – replacement planting** Paragraph 13.5.13 of **ES Appendix 13.6 [APP-236]** states that National Grid has committed to a 3:1 tree replacement ratio for individual trees and small groups of trees. It further notes that you would prioritise such replanting within the Order limits, although offsite provision may be required. The outline LEMP [AS-046] states (paragraph 9.3.6) that discussion is ongoing with landowners and third parties regarding the provision of offsite tree planting and that an offsite planting delivery scheme will be provided to the relevant Local Planning Authorities for their information, which provides details of the offsite provision. Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered? All local authorities – Is the provision of an offsite planting delivery scheme document acceptable to you? Do you have any comments on what it should contain and/or when it should be provided to be most useful to you? How could such details be secured?	**Essex County Council** **Tendring District Council** **Thurrock Council** **Colchester City Council** **Brentwood Borough Council** **Babergh and Mid Suffolk District Council** *[These LPAs submitted responses that are materially identical and therefore are merged for ease of reference. The term (the Council) is used to refer to any of the above Councils in their individual response]* In respect of landscape matters, *(the Council)* has concerns regarding replacement planting such as: • A fixed ratio of 3:1 is not considered appropriate for all replacement planting and should respond to the specific details of planting lost. I.e a Veteran Oak would require far greater replacement than a smaller sapling. The replacement is also subject to stock availability in the UK. • Consideration should also include Landscape Character and ecological habitat creation. • With regards to Off-Site, there are constraints with land ownership, appropriate location and long-term retention and management. Monitoring and management programmes such as those undertaken for Minerals and Waste sites could secure this but need to be carefully managed to ensure they are successful. In respect of green infrastructure, *(the Council*) supports the principle of an Offsite Planting Delivery Scheme (OPDS) to accompany the applicant's 3:1 replacement ratio for individual trees and small groups, as set out in ES Appendix 13.6 and the Outline LEMP. The OPDS is acceptable in principle, but *(the Council*) advises that its usefulness depends on early provision and strategic alignment with wider environmental priorities. Timing The OPDS should be submitted prior to commencement of main works so that LPAs can meaningfully influence site selection and ensure alignment with local and county-wide GI priorities. Content Requirements *(the Council)* expects the OPDS to include:	The Applicant notes Essex County Council's position on replacement planting and agrees that a 3:1 planting ratio would not be suitable to compensate loss of irreplaceable habitat. Outline compensation for veteran trees is provided in Table 5.1 in **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. Paragraph 5.4.53 of National Policy Statement EN-1 (2024) requires that '*a suitable compensation strategy exists*' if there is a loss or deterioration of any irreplaceable habitats. If the veteran trees cannot be retained during the detailed design stage, the compensation measures would be agreed on a case-by-case basis with landowners and detailed in the final Landscape and Ecological Management Plan. The compensation measures proposed will be implementable and proportionate to the impacts attributed to the final detailed design. The Applicant welcomes Essex County Council's support for the principle of an Offsite Planting Delivery Scheme (OPDS) to provide details of the off-site planting provided resulting from the 3:1 tree replanting ratio for individual trees. The Applicant notes the Council's recommendations in relation to the content of the document. In relation to timing, Requirement 8 which details the trees and hedgerows to be retained and removed will be provided prior to commencement. The commitment to replace the individual trees and individual trees within small groups will be secured through the legal agreement prior to commencement. It is not, however, possible to provide the OPDS pre-commencement as the full details of what planting can be provided onsite will not be known until Requirement 9 has been discharged. Once this has occurred any on-site deficit can be detailed in the OPDS and then details provided as to the number of trees to be delivered off-site, location (where appropriate) of off-site trees and timings for delivery of the planting. The comments regarding the content of the OPDS are noted and will be reviewed. The nature of the management and monitoring regime imposed for the restoration of minerals and waste sites

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• A clear summary of onsite planting capacity and the resulting offsite requirement. • Site selection criteria aligned with the Essex Local Nature Recovery Strategy (LNRS) and the Essex Green Infrastructure Strategy, demonstrating contributions to ecological connectivity, canopy cover and climate resilience. • Mapping of proposed offsite locations and their relationship to priority habitats, GI networks and landscape character. • Species selection principles based on local provenance and resilience. • Aftercare, monitoring and reporting arrangements Securing the Details The OPDS should be secured via Requirement 4 (LEMP) or a dedicated DCO Requirement, with offsite planting on third-party land supported by a legal agreement to ensure delivery and long-term management.	reflects the scale and complexity of the on-site restoration. Restoration schemes can often involve complex landform reconstruction. Applying the same regime to the off-site planting of trees would be disproportionate, given the limited scale, relatively low risk and straightforward establishment of the planting. It is intended for the planting to be managed for five years. The OPDS will be secured by legal agreement. Any on-site planting as part of the 3:1 commitment will be agreed under Requirements 4 and 9. It is not considered that a requirement is necessary.
			Chelmsford City Council CCC together with the other Host Authorities is currently negotiating the terms of the proposed offsite planting with the Applicant with a view to forming a S106 to secure the planting. In principle CCC welcomes the proposed 3:1 replacement tree planting ratio, but acknowledges this is very limited and has several concerns. A fixed ratio of 3:1 is not considered appropriate for all replacement planting and should respond to the specific details of planting lost. Mechanisms need to be set up to deal with specific matters including the loss of veteran trees / ancient woodland, which by definition are irreplaceable. A Veteran Oak would require far greater replacement than a smaller sapling. The replacement is also subject to stock availability in the UK. Consideration should also include Landscape Character and ecological habitat creation. In the event that off site planting is proposed and new sites are required, CCC queries whether monies would be provided for the funding of the purchase of offsite locations for the siting of trees? There are constraints with land ownership, appropriate location and long-term retention and management.	The Applicant has shared the Heads of Terms for a s.106 Unilateral Undertaking in relation to the offsite tree planting required as a result of the commitment of the 3:1 replanting ratio for individual trees and individual trees within small groups. The Applicant welcomes Chelmsford City Council's support for the principle of the 3:1 commitment. The compensation measures proposed for veteran trees are outlined within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]** with the final details, including replacement planting ratio, to be agreed through the final Landscape and Ecological Management Plan(s). The details of the delivery mechanism for any off-site tree planting required as a result of the 3:1 commitment are still being considered.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Monitoring programmes such as those undertaken for Minerals and Waste sites could secure this but difficult to manage.	
			South Norfolk District Council The provision of an offsite planting delivery scheme raises several concerns: • It is not clear how 3:1 ratio will be provided for small groups of trees as the number of trees within the group are not quantified. It is also unclear what constitutes a 'small group'. • Similarly, where low quality and very low quality trees have not been recorded individually (13.3.8 APP-236 Volume 6 ES 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA (Final Issue A) (includes Annex C Tree Schedule)) it is unclear how the 3:1 ratio will be quantified • It is not clear where the offsite areas will be provided, or how they would be secured (and for how long) (e.g. secured in perpetuity via a S106), or monitored (would monitoring report be provided to the LPA). Ideally the offsite planting delivery scheme areas should be adjacent to/close to the area impacted which would go some way to compensating for impacts from fragmentation. At the present time they could be located anywhere • It is proposed that some trees will be 'coppiced to ground' – these should also be included in the 3:1 ratio as coppicing will effectively kill most trees. • The 3:1 ratio also needs to apply to pre commencement works. • There is further uncertainty as some trees/groups of trees are identified as being 'potentially affected'. At what point will this uncertainty be clarified and how will the numbers be reported to ensure 3:1 compliance? Whilst mitigation is not simply a matter of numbers, three for one is acceptable for the replacement of unremarkable trees (that is not veteran or ancient) if their successful establishment can be guaranteed	The Applicant recognises the surveys to date have not quantified the number of trees within low quality groups, but commitment GG14 has been made in **7.2 Outline Code of Construction Practice [Revision D]** which states: *'Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.'* Through these additional surveys the number of trees will be confirmed. 'Individual trees within small groups' are individual trees that do not form part of a broader habitat type, such as a woodland, as defined by UKHab methodology. This distinction has been made to remove any double counting of replacement tree planting and Biodiversity Net Gain requirements. It is not possible to identify offsite locations at this stage. During the site selection, sites closer to the Order Limits will be favoured over sites further away. The Applicant will secure the commitment to provide 3:1 tree planting and deliver the off-site component of the tree planting through the Unilateral Undertaking. The agreement with the landowner to secure the planting will be on a voluntary basis. The Applicant does not intend to secure the planting in perpetuity but as the planting will be voluntary, the recipients of the planting will support its provision which is anticipated to provide a greater longevity than imposing the planting on landowners. The Applicant intends for the planting to be managed for five years. It is not the intention to provide monitoring reports to the Local Planning Authority. Paragraph 10.2.2 in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** details the monitoring natural regeneration of coppiced trees: *'Inspections will also be undertaken of any areas that were coppiced during construction to check that the coppicing is re-establishing. This will confirm that these*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				areas are regenerating as planned or will identify the need for further measures, such as additional planting where the coppicing is not leading to successful regrowth.' All individual trees and individual trees within small groups removed by the Project will be subject to the 3:1 replacement. The compensation measures for irreplaceable habitat are considered separately and outlined within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]** with the final details to be agreed through the final Landscape and Ecological Management Plan(s).
			Braintree District Council The Council is in principle comfortable with the concept of an offsite planting delivery scheme, recognising that constraints within the Order limits may limit opportunities for full onsite replacement. However, to ensure that the 3:1 replacement commitment is achieved in a meaningful and locally appropriate way, the Council would require early sight of proposed offsite locations together with an explanation of how these have been selected. This would need to include confirmation that the sites are suitable for long-term establishment, are deliverable, and provide an appropriate functional and landscape replacement for lost canopy cover. The Council would expect native species of local provenance to be prioritised, and the scheme should clearly set out planting specifications, maintenance and establishment requirements, long-term management arrangements, and mechanisms for securing the land for planting. It would be essential that the scheme demonstrates equivalence in ecological, landscape, and canopy value to the trees lost. A Unilateral Undertaking (S106) is currently being circulated prior to being sent to the Applicant to seek to progress securing the mechanism for how this will be delivered. Overall, the Council considers that an offsite planting delivery scheme is acceptable in principle, provided it is supported by sufficient detail on location, suitability, planting approach, and long-term management to ensure that compensatory planting is deliverable and proportionate to the impacts arising.	The Applicant welcomes the Council's support in principle. The Project will prioritise planting within the Order Limits although offsite planting is likely to be required. Planting provided onsite in relation to the 3:1 commitment would be discharged through Requirement 4 and Requirement 9. In relation to the off-site planting, the Offsite Planting Delivery Scheme will be secured through the legal agreement and provided to the Local Planning Authorities. Planting would be provided by voluntary agreement with locally appropriate species used.
			Suffolk County Council	The Applicant notes Suffolk County Council's comments.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			SCC, alongside the other host authorities, are engaging with the Applicant regarding their commitment to provide an offsite planting delivery scheme at a ratio of 3:1 for the replacement for individual trees. SCC finds the proposed approach to be acceptable. The Council is seeking to secure this commitment through a schedule to the legal side agreement between the Applicant and host authorities, as detailed in answer to question GEN 1.21 above.	
			Norfolk County Council Tree planting should be guided by current national guidance including the UK Forestry Standard (UKFS). Planting must be in accordance with Norfolk's Tree Planting and Resilience Strategy and in line with Norfolk's LNRS. Any planting adjacent to highways (including public rights of way) must not create a physical or visual obstruction and not be within 15ft of the centre of the carriageway without NCC Highways approval. Replanting offsite would be triggered should there be no viable planting options onsite in line with the above planting guidance. Provision of offsite planting can be considered acceptable if carried out with legal agreement with landowners and accompanied with a robust programme of maintenance and monitoring to both achieve and demonstrate successful establishment of trees planted. To mitigate issues of planting not becoming established it is recommended that mechanisms and funding are in place to enable replanting (potentially at alternative locations should failure be attributed to site conditions).	Paragraph 9.2.1 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** (LEMP) confirms reinstatement planting will be undertaken by a suitably experienced contractor in line with the current British Standards outlined in BS 4428:1989 Code of Practice for general landscape operations[24], and BS 8545:2014+1:2026 Trees: from nursery to independence in the landscape[25]. Details of the on-site tree planting will be provided in accordance with the final LEMP secured under Requirement 4 (if provided within the Environmental Areas) or the Reinstatement Planting Plan secured under Requirement 9 (as appropriate) of **3.1 Draft Development Consent Order [Revision D]**. Paragraph 9.3.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** confirms that the Project will prioritise the replanting for individual trees within the Order Limits. Details of the off-site planting will be provided within the Offsite Planting Delivery Scheme which is to be secured by legal agreement. The Applicant notes the Council's comments regarding the desire for planting to be in accordance with the Tree and Planning Resilience Strategy and Norfolk's Local Nature Recovery Strategy and will consider this further.

[24] British Standards Institution (1989) *BS 4428:1989 Code of Practice for general landscape operations*

[25] British Standards Institution (BSI) (2026) *BS 8545:2014+A1:2026 Trees: from nursery to independence in the landscape – Code of practice*. London: BSI.

13. Minerals and Waste

Table 13.1 Minerals and Waste

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
MW 1.1	Norfolk CC Suffolk CC Essex CC Thurrock Council	**Minerals safeguarding - 1** Taking account of the impact of the project on existing and proposed mineral sites, do you consider: • the proposed development has sufficiently taken account of the need to safeguard mineral resources • the proposed development complies with your current and/ or emerging plans. If not, what further mitigation measures do you consider are required.	**Essex County Council** ECC in its capacity as the Minerals and Waste Planning Authority (MWPA) is satisfied that the applicant has proactively engaged with the MWPA and through Document 6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment, provides an appropriate summary and response to mineral safeguarding matters. The MWPA considers the Mineral Resource Assessment (MRA) competent in addressing the requirements of MLP Policy S8 at a strategic level. It accepts the MRA's conclusion that, although the project will sterilise some mineral resources, it is not practical to engage in a programme of prior extraction across the entirety of the route. The MWPA further notes that where there is recognition that the proposed development may conflict with current or future extraction activity, appropriate mitigation measures are being pursued. Paragraph 9.5.17 of the MRA confirms that the Order Limits and Study Area overlap with several Candidate Sites that have been submitted for future allocation under the MWPA's Call for Sites for the emerging Essex Minerals Local Plan. The MRA notes that these sites have not currently been allocated but that they could become so in the new MLP once adopted. Regarding these sites, the MWPA acknowledges that the Candidate Sites currently carry little weight as part of any planning judgement respective to land-use matters relating to the NSIP scheme. The MWPA therefore welcomes that National Grid have created flexibility where possible through Route Options which will enable the minimisation of the impact on any Candidate Sites which may be selected as Preferred Sites and subsequently allocated in the future. At this project level, engagement between the DCO applicant and existing and Candidate Site promoters is demonstrated as being ongoing within the evidence base, with discussions focussing on potential route variations to minimise or eliminate the sterilisation of permitted reserves, including alternative routes where Candidate Sites may be allocated as part of the ongoing Minerals Local Plan Review. As these discussions are ongoing, and the MWPA have not been provided with any finalised	The Applicant welcomes confirmation from ECC that it is satisfied with the Applicant's engagement and assessment in relation to minerals safeguarding.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			alternative route options, the MWPA cannot yet take a final view on potential impacts on the deliverability of existing allocations or Candidate Sites. However, nothing currently indicates that the MWPA's plan making responsibilities as a whole will be adversely affected by the applicant's approach. The MWPA would, in principle, seek to uphold its existing mineral planning permissions and preserve its suite of Candidate Sites. It is, however, recognised that National Grid, the landowner and the operator or promoter may reach a private agreement throughout the DCO process. Where this transpires, the MWPA would respond as dictated by its land-use planning responsibilities.	
			Norfolk County Council Norfolk County Council, as the Minerals and Waste Planning Authority for Norfolk, considers that the proposed development has sufficiently taken account of the need to safeguard mineral resources in Norfolk and is in general compliance with the adopted Norfolk Minerals and Waste Local Plan (May 2025). The applicant and the Mineral Planning Authority have had a proactive and constructive dialogue throughout the preparation of the project regarding mineral and waste safeguarding issues.	The Applicant welcomes confirmation from NCC that it is satisfied with the Applicant's engagement and assessment in relation to minerals safeguarding.
			Thurrock Council Thurrock Council consider further mitigation measures should be considered in respect of minerals safeguarding. The applicant included a Qualitative Minerals Resource and Infrastructure Assessment (Ref.AENC-ARC-ENV-REP-0158, August 2025) as part of the submission. The report was included as an Appendix to Chapter 9 of the Environmental Statement, 'Contaminated Land, Geology and Hydrogeology'. Minerals policy is discussed in section 9.2 of the Qualitative Minerals Resource and Infrastructure Assessment, and this includes references to mineral safeguarding policies. Thurrock Council have reviewed the submitted information and have considered the impacts on minerals and minerals infrastructure safeguarding on land within the Unitary Authority area (Section H). As described in the draft Statement of Common Ground (SoCG) issued in February 2026, Thurrock Council feel that an incidental extraction scheme should be considered (or at least not completely discounted at this stage) in respect of resources that may underly the new substation in Section H. National Grid have not issued an updated	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of **6.9 Environmental Statement Chapter 9 – Contaminated Land Geology and Hydrogeology [APP-181]** and set out in **7.2 Outline Code of Construction Practice [Revision D]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address the potential effects. This matter remains under discussion pending review of the potential for incidental extraction at the substation. The Applicant will continue to engage with Thurrock Council on this matter and provide an update at a future deadline.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			SoCG, since the draft was issued, and it is possible our previous comments are still being reviewed. As described in the draft SoCG, this area of the Order Limit (where the substation is proposed) appears to coincide with a Mineral Safeguarding Area (MSA) for sand and gravel. It is understood that the substation would be 300m x 340m, so 102,000m2 (10.2 hectares). The Qualitative Minerals Resource and Infrastructure Assessment (that is appended to ES chapter 9) states an incidental extraction scheme is not viable. There are references made (in paragraphs 9.5.28, 9.5.30, 9.5.34, 9.5.40, 9.5.43, 9.5.44, and 9.5.46 & 9.6.4) that incidental extraction would lead to engineering requirements, additional cost, storage of significant overburden, and increased timescales. The Council consider incidental extraction to be when minerals are incidentally encountered during construction works and are recovered and put to beneficial use either on or off site. These materials would be encountered and need to be managed anyway, whether they contain minerals or not, and whether they are recovered for beneficial use (mineral) or removed from site as muckaway (non mineral). No additional amount of material would be generated in an incidental scheme to a standard development with no underlying minerals, so there would be no increased storage requirement. Likewise, material would only be encountered that requires removal/ management anyway so there would be no increased engineering requirement. There would be no notable increase in cost or timescales. Thurrock Council consider that the implementation (or at least further consideration, pending site investigation work) of an incidental extraction scheme, for the land that coincides with the new substation, would help to mitigate the impact on mineral resources/ Mineral Safeguarding Areas, and is not an unreasonable request. It is considered that this would be a more sustainable approach, and indeed one which is a fairly standard practice, and is not onerous to the developer.	
			Suffolk County Council SCC will consider this matter further and respond at the next deadline.	Noted. The Applicant will review the SCC response once submitted.
MW 1.2	The applicant IPs with quarrying interest	**Minerals safeguarding - 2** Following construction, please detail what minerals extraction would be able to be undertaken below operational power lines and in the immediate vicinity of pylons, detailing various scenarios and restrictions for differing pylon heights and types.	**Stanfords Colchester LLP (on behalf of Blackwater Aggregates)** *Executive Summary* The total reserve excluding any disturbance caused by the Norwich to Tilbury Scheme as shown on the National Grid plan, is estimated at **4 million tonnes of sand and gravel**.	Where mineral extraction proposals are brought forward in proximity to operational overhead lines, the assessment process would typically involve the provision of a line schedule illustrating the overhead line at its maximum sag and sway, taking account of conductor temperature and wind loading. From this worst-case position, a minimum vertical clearance of 5.3 metres

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			The extractable tonnage is critically dependent on the final alignment of the Norwich to Tilbury Scheme transmission line and the operational restrictions that may be imposed by National Grid Electricity Transmission (NGET). **Optimal Outcome:** With agreed control measures to extract beneath power lines, the sterilisation is reduced to the pylon footprints only. **Risk Outcome:** If excavation is prohibited under the line, up to **4 million tonnes** could be sterilised, rendering the site economically unviable. **Existing Alignment** *Sterilisation Impact based on Cable Route and Pylons* If National Grid refused to allow the quarry's plant and equipment (i.e. A60 dump trucks and EX480 excavators or similar) to operate under the transmission line, due to existing landownership restrictions, it would render the site uneconomic to work and would therefore sterilise the entire **4 million tonnes** of sand and gravel reserve. In consideration of the current National Grid route plan, approximately **136,500 tonnes** of sand and gravel will be sterilised if a **30m radial standoff** is required from pylons TB083 and TB084 as placed on the current route plan. If National Grid refused to allow the excavators (i.e. EX480 excavators or similar) to operate under the transmission line but permitted a haul road suitable for fully loaded dump trucks (i.e. A60 or similar) to pass under the transmission lines, it is estimated that a swathe of approximately **650,000 tonnes** of sand and gravel would be sterilised. *Clearance required for Quarry Plant* In consideration of the existing NGET overhead line, specifically the cable route between pylons TB083 and TB084, safe vertical clearance must be maintained for the quarry's proposed plant and equipment. • Relevant Plant: Articulated dump trucks (e.g. Volvo A60) and hydraulic excavators (e.g. Komatsu EX480 or equivalent) • Required Clearance: In accordance with NGET Design Guidelines for Development Near Pylons and HVO Power Lines (Table 1: Overhead Line Conductor Clearances, Items 3 and 4), a minimum vertical clearance of 9.2 m to 10.5 m must be maintained between the lowest conductor and the highest part of any operating plant. Whilst any quarrying operations under the transmission line would be subject to a site-specific risk assessment, reasonable control measures could be applied to the works which would reduce sterilisation to the sand and gravel reserves. To summarise under the existing alignment, the	would be required to be maintained between the conductors and plant, or excavation activity. A 30-metre clearance should be maintained from the furthest extent of pylon foundations to the start of any excavation, to allow for safe access and maintenance and to prevent undermining of pylon foundations. Works within the 30-metre clearance distance may be authorised by exception, subject to agreement with National Grid. In the case of the Bradwell Quarry. Church Road, Bradwell, the Applicant has committed to an alternative scenario that responds to discussions with the stakeholder and the change in planning status of the site, and will now progress with the alternative as the preferred option. This is reflected in the **8.11 Approach to Scenarios [Revision B]** and **8.3.27 SoCG with Blackwater Aggregates [Revision B]**, both submitted at Deadline 4.

following sterilisation outcomes apply depending on NGET's operational restrictions:

Scenario	Operational Restriction	Sterilised Tonnage	Economic Viability
A. Controlled Access	Full quarrying permitted under the line subject to SSRA and height controls.	**136,500 tonnes** (Loss limited to pylon footprints only)	**Viable** Full reserve accessible.
B. Haul Road Only	Excavators prohibited under the line; haul road for loaded dump trucks (A60) permitted.	**~650,000 tonnes** (Sterilised swathe where excavation cannot occur)	**Marginal** Significant reserve loss; may impact phasing.
C. Total Exclusion	All plant (excavators and trucks) prohibited under the line.	**~4,000,000 tonnes** (Entire reserve beneath and adjacent to the line)	**Uneconomic** Site rendered unworkable.

[second image not legible]

Alternative Alignment

Blackwater Aggregates / Stanfords LLP have met with National Grid regarding an alternative alignment for the power lines and to move pylons TB083 and TB084 outside the main extraction area. The alternative pylon locations are indicated using yellow boxes. Whilst this reduces the risk, sterilisation remains possible if excavation restrictions are enforced. *[image -see document]*

In the event the pylons were located outside the main extraction area, and the transmission line had a clearance of **9.2 m to 10.5 m**, reasonable control measures could be applied which would avoid sterilising any sand and gravel.

If National Grid refused to allow excavators to operate under the realigned transmission line but permitted a haul road for fully loaded dump trucks, it is estimated that approximately **330,000 tonnes** of sand and gravel would be sterilised.

To summarise:

Scenario	Operational Restriction	Sterilised Tonnage	Comment
A. Controlled Access	Full quarrying permitted under the realigned route.	**Negligible** (No loss of mineral beneath the line)	Optimal outcome; preserves full reserve.
B. Haul Road Only	Excavators prohibited; haul road permitted.	**~330,000 tonnes** (Reduced swathe compared to existing alignment)	Still represents a significant avoidable loss.

Current Status and Next Steps

Consultation: Stanfords LLP has met with National Grid to discuss the alternative alignment and responded to the draft Statement of Common Ground.

Outstanding Items: Awaiting formal response from Fisher German and National Grid regarding:

- Acceptance of the revised route;
- Confirmation that controlled quarrying (Scenario A) is permissible;

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Agreement on height restrictions and safety protocols; • Responses to the draft Statement of Common Ground. *Conclusion:* To prevent the sterilisation of a nationally important mineral resource, it is imperative that National Grid confirms acceptance of the alternative alignment and agrees to a Wayleave permitting controlled excavation beneath the line.	
MW 1.6	The applicant Essex CC	**Minerals resource at Lowleys Farm** Brett Aggregates Ltd in its Deadline 1 submission **[REP1-210]** has raised concerns about the potential impacts on its minerals prospect site at Lowleys Farm. As it currently stands, Brett Aggregates Ltd contends that the route for the proposed development would run through the middle of the mineral scheme and over its deepest point. The applicant and Essex CC are requested to respond to the concerns raised by Brett Aggregates Ltd. Furthermore, the applicant is also requested to clarify what, if any, scope exists for the route to be altered to mitigate the impacts on this minerals resource that have been raised by Brett Aggrehates Ltd. The applicant should also explain the reasons for the order limits detail to the east and south of TB128 to TB133 which appears to extend towards the eastern limits of Lowleys Farm with no indication of the works which will be undertaken within the area between the proposed line of pylons and Lyonshall Wood.	**Essex County Council** Document Reference REP1-210 accurately conveys the current position which is that Essex County Council as MWPA does not currently "object to the DCO as it has been 'informed by NG that no significant operational impacts are envisaged' at Lowleys." The representation continues by indicating that, for this to be true, a realignment of the route would need to take place. The MWPA would, in principle, seek to preserve its suite of Candidate Sites through the plan-making process. It is, however, recognised that all Candidate Sites currently carry little weight as part of any planning judgement respective to land-use matters relating to the NSIP scheme. The MWPA, therefore, welcomes that National Grid have created flexibility where possible through Route Options which will enable the minimisation of the impact on any Candidate Sites which may be selected as Preferred Sites and subsequently allocated in the future. It is, however, the case that final route alignments within prescribed Order Limits are still subject to negotiation and, therefore, the final proposed routing has not been made available to the MPWA to enable it to provide a final position other than that previously stated. It will be incumbent on the MWPA to formally qualify any impact on Candidate Sites with site promoters when a final decision is made on which sites to allocate as Preferred Sites. That said, irrespective of whether the site is selected as part of this Call for Sites or not, mineral policy is drafted such that any impact on finite resources should be minimised if not capable of being avoided altogether so appropriate practice would be to at least avoid the richest part of the deposit. Further, and again without prejudice to any future intention to allocate this Candidate Site, that there is demonstrable interest in working the location increases the likelihood that this site could at some point provide the resource that future generations could use. It is further recognised that National Grid and the operator or promoter may reach a private agreement throughout the DCO process as a consequence of a reduction in available yield. Where this transpires, the MWPA would respond as dictated by its land use planning responsibilities.	The Applicant acknowledges the presence of a mineral deposit within the site at Lowley's Farm and that the design would potentially constrain or prevent the full extraction of this resource, and that as it currently stands the Project alignment would extend through the deepest point. It is not possible to fully avoid the mineral site within the DCO Limits of Deviation, however, it is possible to allow flexibility in the alignment to reduce the impact on the effects on the mineral site, should it be progressed. Widened Order Limits have been proposed in this location to allow for an alternative scenario that would reduce the impacts on the minerals site. This includes the potential relocations of pylons TB128 to TB133 further to the south-east within the widened Order Limits. Brett Aggregates Ltd. have provided the Applicant with site plans and information on extractable depths. Detailed routeing, pylon locations and pylon specifications for the Project have not yet been finalised, and the full extent of the impact cannot yet be determined. The Applicant will continue to work with Brett Aggregates Ltd. as the detailed design develops to fully understand the extent of any potential impact. Further detail of the proposed Scenario B option is included in Table 2.6 of **8.11 Approach to Scenarios [Revision B]**, submitted at Deadline 4. A record of engagement with Brett Aggregates Ltd is included in **8.3.32 Draft Statement of Common Ground - Tritton Farming Partnership and Brett Aggregates (Lowleys Farm Mineral Site) [Revision A]** additionally submitted at Deadline 4.

14. Noise and vibration

Table 14.1 Noise and vibration

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
NV 1.4	The applicant	**Noise general/ precision - 2** A number of County and Local Authorities raise concerns related to construction noise at Noise Sensitive Receptors (NSR). Braintree DC in its LIR **[REP1-148]** suggests a more precautionary, enforceable framework should be secured within in the draft DCO, including: i. revised core working hours (See question DCO 1.S9) ii. a 50 dB limit during start-up and close-down at the nearest NSRs iii. restrictions on all piling activities (not percussive piling only) iv. targeted and defined temporal restrictions, where residual significant effects remain The ExA considers that in the absence of such measures there would be a clear risk that construction noise impacts at NSRs could give rise to significant adverse effects that have not been adequately mitigated. Please review the draft DCO accordingly or justify why such measures are not necessary to be included in the draft DCO.	**Chelmsford City Council** CCC welcomes the measures proposed by Braintree District Council. **Holton St Mary Parish Council** HSM wishes to know how noise affecting the village and individual residents will be mitigated and what scientific evidence National Grid can attest. Reduced operating hours may help; however excess levels in daytime must be eliminated. One example would be to prohibit vehicle reversing warning alarms. Also, noise levels above Babergh District Council's guidelines must be avoided., i.e. below 34 dBA, or 10 dBA above background level at night. The effect on residents must be assessed and the hours reduced as necessary, even if it prolongs the construction period.	Noted. A response to these points was provided in to NV 1.4 in **8.9.1 Applicant's Reponses to First Written Questions**. Construction noise will be mitigated using best practicable means (BPM), as committed to in commitment NV01 of **7.2 Outline Code of Construction Practice [Revision D]** (CoCP), following detailed assessments, as committed to in NV05 of the CoCP. Details of the specific mitigation will be documented in the Noise and Vibration Management Plan (NVMP), as per commitment NV05 of the CoCP. Example mitigation measures are provided in Table 14.10 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Reversing vehicle alarms are a required safety mechanism. However, the use of broadband, rather than tonal, reversing alarms would constitute BPM and would therefore be used where it is safe to do (noting that there are certain circumstances where broadband reversing alarms may not be suitable for safety reasons). The BPM specified would serve to avoid significant adverse effects and mitigate and minimise adverse effects from construction noise and vibration. The 34 dBA, or 10 dB above background levels at night stated, are not applicable and do not appear to form part of Babergh District Council's guidelines. Rather, construction noise assessments are conducted with reference to BS 5228, which includes suitable thresholds for potential significant adverse effects during different time periods, including night-time. Should works be predicted to exceed the relevant thresholds, even with BPM to reduce noise, temporal restrictions may be employed to avoid significant adverse effects.
NV 1.5	The applicant Relevant local authorities	**Use of use of triple Araucaria conductors or alternative technology** Throughout ES Chapter 14 **[APP-256]** reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons).	**Essex County Council** ECC considers that should there be a need for alternatives to the use of triple Araucaria conductors, there should be certainty that the alternative is of the same or better in relation to noise levels. It considers this could be secured through a requirement that could be discharged by the relevant discharging authority for the section of line affected. Where that would involve	**7.2 Outline Code of Construction Practice [Revision D]** includes commitment GG13 which has been updated at Deadline 4 to state: *'The Project would include triple Araucaria conductors on all spans (or alternative technology that performs to the same or better standard with regards to operational noise effects)'.* Note: Where modifications for existing

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		In the event of alternative technology being used, as opposed to the use of the use of triple Araucaria conductors on part or all of the route, should a mechanism be included to ensure that alternative technology is of the same or better standard in relation to noise on standard lattice pylons. In the event a mechanism should be used, what form should the mechanism take (ie should it be a requirement within the DCO), should there be a need to agree to the alternative technology and should there be a discharging and appeal authority? In addition to the above, the ExA notes ES Chapter 7 paragraph 7.9.4 Refers to pylons TB140 to TB142 (inclusive) to the south of River Chelmer being low height pylons. However, this paragraph also refers to feedback that was received during consultation in 2025 and certain technical details being refined. This paragraph states " as a result, flexibility has been retained to allow for the installation of standard lattice pylons in this area instead." However, the ExA notes ES Chapter 14 (Noise and vibration) states a low noise conductor system will be used. Can the applicant confirm, should the design change in relation to pylons TB140 to TB142 (inclusive) to standard lattice pylons, or any other form of pylon, be necessary the low noise conductor system will be used as part of those pylons?	multiple, authorities, given the test would the same or better noise emissions, this should be relatively straight forward to determine consistent across all authorities. A Requirement could be worded as follows: 1. No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of— (a) the design, specific and acoustic attenuation of the conductor system relating to those pylons have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. 4. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal. However, in terms of general comments especially in respect of any low height pylons, as current envisaged between the Waltham's, it is unclear how the triple Araucaria conductors compare to the low noise conductor systems? Are noise levels within a low height conductor system lower than those used within a triple Araucaria system? ECC would support CCC view that in the event that pylons TB140 – TB142 are increased in height to standard lattice height pylons, or any other type of pylon, CCC consider the lowest noise generating conductor system should be used.	transmission overhead lines are required, like-for-like conductors are proposed. Requirement 4 in **3.1 Draft Development Consent Order [Revision D]** (CoCP) requires that prior to commencement of the development, a final CoCP must be submitted to and approved by the relevant Local Planning Authority. The final CoCP must be substantially in accordance with the Outline CoCP. Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons. The Applicant must adhere to the commitments within the final CoCP which will be approved by the relevant Local Planning Authority. If an alternative technology is proposed to be installed by the Main Works Contractor(s) the Applicant would satisfy itself of compliance with the final CoCP, by requiring the Main Works Contractor(s) to provide evidence that the alternative conductors proposed would perform to the same or better standard on standard lattice pylons. The Applicant can confirm that the low noise triple Araucaria conductor (or alternative technology that performs to the same or better standard) is proposed on all pylon types (including low-heights) for the new overhead line and is not affected by the flexibility in pylon type. For clarity, triple araucaria is the quietest conductor system currently available.
			Chelmsford City Council CCC would welcome clarification of this matter. should there be a need for alternatives to the use of triple Araucaria conductors, there should be certainty that the alternative is of the same or better in relation to noise levels. It is unclear how the triple Araucaria conductors compare to the low noise conductor systems? Are noise levels within a low height conductor system lower than those used within a triple Araucaria system? In the event that pylons TB140 – TB142 are increased in height to standard lattice height pylons, or any other type of pylon, CCC consider the lowest noise generating conductor system should be used.	Noted. There is no intention to use an alternative conductor on the Project. This includes standard and low-height pylons. As noted in response to the comment from ECC above, commitment GG13 in **7.2 Outline Code of Construction Practice [Revision D]** has been updated at Deadline 4 to state: *'The Project would include triple Araucaria conductors on all spans (or alternative technology that performs to the same or better standard with regards to operational noise effects)'*. Note: Where modifications for existing transmission overhead lines are required, like-for-like conductors are proposed. Compliance with the CoCP is secured by Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			CCC propose that details of the conductor system are submitted to CCC by requirement prior to first use. Great Waltham and Little Waltham – Pylons TB140 – 142 (inclusive) 1. No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of— a) the design, specific and acoustic attenuation of the conductor system relating to those pylons have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. 4. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.	Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons. The Applicant can confirm that the low noise triple Araucaria conductor (or alternative technology that performs to the same or better standard) is proposed on all pylon types (including low-heights) for the new overhead line and is not affected by the flexibility in pylon type.
			Norfolk County Council Norfolk County Council defers on matters relating to noise and vibration to South Norfolk District Council.	Noted. There is no intention to use an alternative conductor on the Project. This includes standard and low-height pylons.
			South Norfolk District Council This can be secured by a requirement such as the one below. No change of plant or equipment without consent No plant or equipment of any kind shall be changed on the site without precise details of the equipment being submitted to and approved in writing by the local planning authority. This shall be supported as necessary by a Noise Impact Assessment to validate that there will be noise change in the noise environment. This will need to be discharged via the LPA.	As noted in response to the comment from ECC above, commitment GG13 in **7.2 Outline Code of Construction Practice [Revision D]** has been updated at Deadline 4 to state: *'The Project would include triple Araucaria conductors on all spans (or alternative technology that performs to the same or better standard with regards to operational noise effects)'.* Note: Where modifications for existing transmission overhead lines are required, like-for-like conductors are proposed. Compliance with the CoCP is secured by Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**. Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons.
			Colchester City Council CCC considers that should there be a need for alternatives to the use of triple Araucaria conductors, there should be certainty that the alternative is of the same or better in relation to noise levels. It considers this could be secured through a requirement that could be discharged by the relevant discharging authority for the section of line affected.	Noted. There is no intention to use an alternative conductor on the Project. This includes standard and low-height pylons. As noted in response to the comment from ECC above, commitment GG13 in **7.2 Outline Code of Construction Practice [Revision D]** has been updated at Deadline 4 to state: '*The Project would include triple Araucaria conductors on all spans (or alternative technology that performs to the*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			A Requirement could be worded as follows: 1. No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of— a) the design, specific and acoustic attenuation of the conductor system relating to those pylons have been submitted and approved by the relevant planning authority for that phase. 2. The details submitted must accord with the outline design principles. 3. The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan. 4. For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.	*same or better standard with regards to operational noise effects)'.* Note: Where modifications for existing transmission overhead lines are required, like-for-like conductors are proposed. Compliance with the CoCP is secured by Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**. Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons.
			Braintree District Council The Council agree that, as a point of principle, any alternative should perform to the same, if not better, standard. Ideally the use of better/alternative technology would be secured by a Requirement – but viability/costs issues may arise (i.e. matters/issues for the Applicant). In terms of any variation to approved Works/details and/or use of alternative technology, BDC consider that this would caught by Paragraph 1(3) of Schedule 3 of the dDCO. Namely, there is a pre-existing route for any alternative technology to be authorised through Schedules 3 and 4 of the dDCO as currently drafted.	Noted. There is no intention to use an alternative conductor on the Project. This includes standard and low-height pylons. It is agreed that there is a mechanism in the dDCO already to secure alternative technology. It is not necessary to impose a further DCO requirement. As noted in response to the comment from ECC above, commitment GG13 in **7.2 Outline Code of Construction Practice [Revision D]** has been updated at Deadline 4 to state: *'The Project would include triple Araucaria conductors on all spans (or alternative technology that performs to the same or better standard with regards to operational noise effects)'.* Note: Where modifications for existing transmission overhead lines are required, like-for-like conductors are proposed. Compliance with the CoCP is secured by Requirement 4 in **3.1 Draft Development Consent Order [Revision D]**. Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons.
NV 1.7	The applicant Relevant local authorities	**Compaction activities and potential for damage due to construction vibration** ES Chapter 14 **[APP-256]** paragraph 14.7.27 to 14.7.30 (inclusive) indicates there are five structures or buildings where there is potential for damage due to construction vibration from potential compaction activities. It also indicates: i) the identified locations will be reviewed by the main contractor in their specific detailed assessments, prior to the start of work with mitigation	**Essex County Council** ECC has requested a hotline/mechanism for homeowners to contact Grid if issues occur. This could be covered by a pre-commencement condition. **Tending District Council** TDC requests a hotline/mechanism for homeowners to contact Grid if issues occur. This could be covered by a pre-commencement condition.	A contact telephone number will be provided to residents, as detailed in commitment GG30 of **7.2 Outline Code of Construction Practice [Revision D]**.

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		measures put in place, where required, to avoid potential significant effects; and ii) will review all works locations to determine whether any other buildings or structures may be affected by vibration from construction activities. However,no further details are provided. The ExA is concerned in regard to the absence of the further details in regard to both i) and ii) above and seeks the views of both the applicant and Relevant County/ Local Authorities in this regard. Should there be a formal mechanism requiring the further details and mitigation to be submitted and approved. What form should such a mechanism take (ie should it be a requirement within the DCO)? Should there be a need to agree the additional mitigation measures to avoid potential significant effects.	**Norfolk County Council** Norfolk County Council defers on matters relating to noise and vibration to South Norfolk District Council. **South Norfolk District Council** The preferred mechanism would be to place a requirement in the DCO which requires that two levels be imposed at all vulnerable receptors • with a lower action level of 0.3mm/s. • and a stop vibration level of 1mm/s. This is quite common on development site, including DCOs, with the 0.3mm/s being the generally accepted limit of detection by humans and 1mm/s being the point when nuisance can be considered to be starting This would then be supported by a suitably worded requirement, requiring the submission of details of the predicted vibration levels and what mitigation measures would be utilised to ensure that the vibration levels would be maintained.	The thresholds stated (0.3 mm/s peak particle velocity (PPV) and 1.0 mm/s PPV) relate to the human response to vibration and are therefore appropriate for such receptors (i.e. buildings which contain people). For buildings and structures which do not contain people, and therefore where the concern is only damage, and not annoyance, a higher threshold would be appropriate relative to the potential thresholds for damage, with an appropriate margin. A requirement is not necessary as construction vibration is adequately controlled by the commitments in **7.2 Outline Code of Construction Practice [Revision D]**, including NV01 to NV05, NV13, NV16 to NV18, NV20, and NV23.
			Braintree District Council The Council suggest that where risk from compaction activities is identified, then that should be tied to a phase/Works with sufficient details submitted, to include works of mitigation, as part of the Requirements for that phase/Works. Schedules 3 and 4 of the dDCO would then be engaged/relevant. It is noted however that no properties in Braintree District have been identified as being at higher risk of damage from construction vibration.	Where a risk of structural damage is identified, details of the works and associated mitigation will be submitted to the local authority via the Section 61 process, as per commitment NV03 of **7.2 Outline Code of Construction Practice [Revision D]**. Additionally, construction vibration is adequately controlled via commitments NV01 to NV05, NV13, NV16 to NV18, NV20, and NV23 of **7.2 Outline Code of Construction Practice [Revision D]**. The risk of damage is low and can be readily mitigated with standard measures. The locations where there is a risk identified are highlighted to ensure such measures are put in place at these locations, and do not indicate a residual risk of damage.
			Babergh and Mid Suffolk District Council The CMP shall have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP. In addition to the CMP, details of all monitoring to be undertaken for noise and vibration are to be submitted with web based functionality which monitors these parameters in real time. Details of all monitoring are to be submitted by the provision and use of a system with access provided to a web based function which monitors the above parameters in real time. The system is to be specific to the application site(s) and include satellite compounds, have regard to all noise sensitive receptors and e and shall have regard to	The Applicant believes that this approach is not required as standard, but that monitoring will be undertaken on a case-by-case basis as part of the construction management processes. This will be secured through Section 61 agreements where required, via consultation with the Local Planning Authority as per commitment NV03 of **7.2 Outline Code of Construction Practice [Revision D]**. Percussive piling will only be used where there is no viable alternative, as per commitment NV23 of **7.2 Outline Code of Construction Practice [Revision D]**. Additionally, where it is used, best practicable means will be employed to reduce the effects of noise as per comment NV01.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			proximity of the nearest noise sensitive receptors, existing measured background noise level and be installed and monitored by a suitably qualified company or individual in acoustics and environmental monitoring. Limits proposed for noise and vibration to be submitted to and agreed in writing with the LPA and a warning level will be set which shall be communicated in real time to the designated officer from the LPA. Percussive piling has the potential to have the most significant impact by virtue of noise and vibration. This method should be avoided. If piling is required other methods should be employed and details provided within the noise and vibration assessment undertaken in accordance with BS5228 (or any subsequent revisions). The management plans will cover all satellite construction compounds. Even though vibration may not amount to a statutory nuisance, it may still pose a potential risk for structural damage. **Suffolk County Council** SCC defers to Babergh and Mid Suffolk District Councils in respect of Noise and Vibration matters.	With regards to structural damage, no locations have been identified where there is a risk of structural damage from percussive piling activities. This would be reviewed by the Main Works Contractor(s) as part of their detailed assessments, as per commitment NV05 of **7.2 Outline Code of Construction Practice [Revision D]**.
NV 1.13	The applicant All local authorities	**EACN and Tilbury North Substations operational noise assessment** ES Appendix 14.3 (EACN Substation Operational Noise Assessment) **[APP-259]** and ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) **[APP-260]**. The ExA is concerned with the reference to 'reasonably practicable' (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to 'reasonably practicable' and BATNEEC including an element of cost within the assessment. The ExA considers any mitigation used must achieve the outcome intended, as set out in tables a 14.3.8 and 14.4.8 respectively, and Best Available Technique (BAT), not BATNEEC, should be employed and secured within the DCO. The ExA seeks the views of both the applicant and local authorities in this regard. Should there be a formal mechanism requiring BAT? What form should such a mechanism take (ie should it be a requirement within the DCO) and, if so, who should the details be submitted to and who is responsible for discharging those conditions?	**Essex County Council** ECC concurs with the Examining Authority's view that Best Available Technique (BAT), rather than BATNEEC, should be employed. The inclusion of cost considerations within BATNEEC risks undermining the delivery of mitigation necessary to meet the defined noise criteria set out in Tables 14.3.8 and 14.4.8. Where operational noise limits are required to protect residential amenity, mitigation must be outcome led and not qualified by cost based judgments. ECC considers that a formal mechanism is required within the DCO to secure the application of BAT for operational noise control at both the EACN and Tilbury North substations. This is necessary to ensure certainty that: • The predicted noise limits will be met in practice; • Noise mitigation is designed, implemented, and verified to achieve the stated outcomes; and • There is a clear and enforceable framework for approval and compliance. A requirement within the DCO is the most appropriate and proportionate mechanism, consistent with established practice for other nationally significant	BATNEEC is not a policy of National Grid, and this terminology is not stated within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** or the associated operational noise assessment appendices **[APP-259]** and **[APP260]**, for the proposed new EACN Substation and Tilbury North Substation, respectively. The assessments are worst-case and based on highest specification noise level data for noise generating equipment (e.g. transformers). Based on this worst-case, the assessments indicate that mitigation of substation noise sources is required to avoid significant adverse effects. Standard noise mitigation for transformers is acoustic enclosures and these are in the design principles for both proposed new substations. With enclosures, adverse and significant adverse effects can be avoided from both, even assuming worst-case transformer sound levels. Noise mitigation at proposed new substations is committed to via commitment NV21 of **7.2 Outline Code of Construction Practice [Revision D]** which has been updated at Deadline 4 to state: '*The proposed new substations will include any required noise mitigation measures by design to ensure significant adverse effects are avoided and adverse effects are*

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			infrastructure projects and recent offshore wind farm consents. ECC will act as the discharging authority for the nearby North Falls and Five Estuaries offshore wind farm projects, which include inter related operational noise requirements. In that context, ECC is already required to consider cumulative and in combination operational noise effects within the area. Assigning ECC responsibility for discharging the EACN operational noise requirement would therefore: • Ensure regulatory consistency across co located NSIPs; • Enable effective consideration of cumulative operational noise impacts; and • Provide clarity for all parties involved. ECC recognises that issues affecting Tilbury North sub station fall under the jurisdiction of Thurrock Council.	*mitigated and minimised. This may include plant selection, siting, screening, and enclosures, as appropriate.*' Additionally, operational noise limits from the proposed new EACN Substation are secured by Requirement 14 of **3.1 Draft Development Consent Order [Revision D]** and these align with the agreed tripartite noise limits with North Falls and Five Estuaries to ensure significant cumulative effects from operational noise are avoided. The proposed new EACN Substation will also come under a tripartite complaints protocol with North Falls and Five Estuaries, as secured by Schedule 3, Requirement 14, sub paragraph (2) of **3.1 Draft Development Consent Order [Revision D]**. Given that the draft DCO already includes a formal mechanism through Requirement 14 securing compliance with operational noise limits in respect of the EACN Substation, it is not necessary to impose a further DCO requirement.
			Colchester City Council Yes, BAT should be employed and it should be secured as a requirement in the DCO. The details should be submitted to both the upper and lower tier LPAs that have jurisdiction over that work area/section for discharge.	BATNEEC is not a policy of National Grid, and this terminology is not stated within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** or the associated operational noise assessment appendices **[APP-259]** and **[APP260]**, for the proposed new EACN Substation and Tilbury North Substation, respectively. It is noted that no substations are proposed in the Colchester City Council district.
			Thurrock Council The Council's Environmental Protection team have reviewed the use of "reasonably practicable" and the Council acknowledges the ExA's concern that BATNEEC introduces a cost-based qualifier which may not guarantee that the mitigation implemented will achieve the noise outcomes identified in the Environmental Statement. The submitted assessments demonstrate that it is feasible to achieve rating levels in accordance with BS 4142, such that significant adverse effects are unlikely, and the Council considers it essential that these outcomes are secured in practice. The Council also notes that paragraph 14.8.3 identifies that, whilst a rating level of approximately 35 dB LAr,T would avoid significant adverse effects, further mitigation of up to 20 dB would be required to achieve a sound level below background, which is identified as the preferred aim where feasible. This indicates that enhanced mitigation is both recognised and achievable. The Council agrees that reliance on BATNEEC alone would not provide sufficient certainty. Mitigation should	BATNEEC is not a policy of National Grid, and this terminology is not stated within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** or the associated operational noise assessment appendices **[APP-259]** and **[APP260]**, for the proposed new EACN Substation and Tilbury North Substation, respectively. The assessments are worst-case and based on highest specification noise level data for noise generating equipment (e.g. transformers). Based on this worst-case, the assessments indicate that mitigation of substation noise sources is required to avoid significant adverse effects. Standard noise mitigation for transformers is acoustic enclosures and these are in the design principles for both proposed new substations. With enclosures, adverse and significant adverse effects can be avoided from both sites, even assuming worst-case transformer sound levels. Specifically at the proposed new Tilbury North Substation, noise levels are predicted to be comfortably below background sound levels during both daytime and

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			be outcome-led and must ensure that the specified noise limits at sensitive receptors are achieved. The Council does not consider that a standalone requirement for Best Available Techniques (BAT) is strictly necessary, provided that robust operational noise limits and a mechanism for approval are secured within the DCO. If such limits are enforceable, the undertaker will be required to implement appropriate mitigation to achieve compliance. However, if the ExA considers it necessary, a requirement could include a reference to BAT in the design and operation of the substations to provide additional clarity. The Council considers that the most effective approach is to secure: • enforceable operational noise limits (based on BS 4142 or equivalent); and a requirement for a detailed noise assessment prior to operation demonstrating compliance with those limits. (See above response). Any such requirement should be discharged by the relevant planning authority.	night-time periods, and would therefore meet the aim stated by the local authority. Noise mitigation at substations is committed to via commitment NV21 of **7.2 Outline Code of Construction Practice [Revision D]**, which has been updated at Deadline 4 to state: '*The proposed new substations will include any required noise mitigation measures by design to ensure significant adverse effects are avoided and adverse effects are mitigated and minimised. This may include plant selection, siting, screening, and enclosures, as appropriate'*.
			Braintree District Council The Council agree that BAT (not BATNEEC) should be employed. This on the basis that any mitigation is required to perform to the same, if not better, standard. The use of BAT should be secured as a Requirement. Upon submission of details for approval, Schedules 3 and 4 of the dDCO would then be engaged/relevant.	BATNEEC is not a policy of National Grid, and this terminology is not stated within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** or the associated operational noise assessment appendices **[APP-259]** and **[APP260]**, for the proposed new EACN Substation and Tilbury North Substation, respectively. It is noted that no substations are proposed in the Braintree district.
			Tendring District Council TDC shares the ExA's concerns regarding the use of the terms "reasonably practicable" and BATNEEC within the operational noise assessments for both the EACN and Tilbury North substations. The inclusion of cost based qualifiers in the assessment of mitigation is not acceptable, introduces imprecision, and risks making any DCO noise requirement unenforceable. TDC has already made this position clear in its LIR and most recent SoCG with National Grid. TDC fully agrees with the ExA that mitigation must achieve the outcomes set out in Tables A14.3.8 and A14.4.8, and that Best Available Technique (BAT) – not BATNEEC – must be applied. BAT is the only standard that ensures that noise limits are met in practice, not merely aimed for subject to developer discretion or cost considerations.	BATNEEC is not a policy of National Grid, and this terminology is not stated within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** or the associated operational noise assessment appendices **[APP-259]** and **[APP260]**, for the proposed new EACN Substation and Tilbury North Substation, respectively. The assessments are worst-case and based on highest specification noise level data for noise generating equipment (e.g. transformers). Based on this worst-case, the assessments indicate that mitigation of substation noise sources is required to avoid significant adverse effects. Standard noise mitigation for transformers is acoustic enclosures and these are in the design principles for both sites. With enclosures, adverse and significant adverse effects can be avoided from both sites, even assuming worst-case transformer sound levels.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			TDC therefore supports the inclusion of a formal and unambiguous BAT requirement within the DCO, expressed as a mandatory requirement and not as an aspirational or cost qualified duty. This approach is necessary to ensure enforceability, compliance with national policy, and protection of residential amenity. TDC confirms that it can act as the discharging authority, provided that National Grid funds the necessary environmental health and acoustic expertise at TDC through a Planning Performance Agreement. This is essential to ensure that noise related requirements – including detailed design submissions, verification, commissioning tests, and compliance monitoring – can be discharged promptly and robustly.	Noise mitigation at substations is committed to via commitment NV21 of **7.2 Outline Code of Construction Practice [Revision D]**, which has been updated at Deadline 4 to state: *'The proposed new substations will include any required noise mitigation measures by design to ensure significant adverse effects are avoided and adverse effects are mitigated and minimised. This may include plant selection, siting, screening, and enclosures, as appropriate'.* Additionally, operational noise limits from the proposed new EACN Substation are included in Requirement 14 of **3.1 Draft Development Consent Order [Revision D]** and these align with the agreed tripartite noise limits with North Falls and Five Estuaries to ensure significant cumulative effects from operational noise are avoided. The proposed new EACN Substation will also come under a tripartite complaints protocol with North Falls and Five Estuaries, as secured by Schedule 3, Requirement 14, sub paragraph (2) of **3.1 Draft Development Consent Order [Revision D]**.

15. Public Rights of Way

Table 15.1 Public Rights of Way

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
PRoW 1.1	Norfolk CC Suffolk CC Essex CC Thurrock Counci	**PRoW general - 1** Please provide a schedule of proposed amendments to the outline PRoW Management Plan, highlighting matters that you consider are not acceptable and require amending and what you consider those amendments should be.	**Essex County Council** ECC has reviewed the outline PROW Management Plan and would request paragraph 5.2.14 to be altered so there is no ambiguity as follows: Current Wording Paragraph 5.2.14 "All signage would be removed once construction is complete in the area, and where possible, all PRoW returned to their previous use, alignment and condition." Proposed Wording *"All signage would be removed once construction is complete in the area, and all PRoW returned to their previous use, alignment and condition unless agreement has been reached with the LHA and landowners or where the project proposes to permanently divert a PRoW."* Furthermore, ECC would like written assurance that the design of the PRoW diversion over the permanent private haul road between Bentley Road and Ardleigh Road will be discussed and agreed with the PRoW Team at ECC. The following wording is proposed to be included at Section 8.7 in the PRoW MP (after paragraph 8.7.2): Proposed Wording *"The design associated with the permanent stopping up and diversion of Little Bromley footpaths 13 and 14 will be discussed and agreed with Essex County Council as local highway authority."* There is also a repetition in paragraph 4.1.3 that could be updated as part of overall amendments.	The Applicant notes the wording provided by Essex County Council in their response to the Examining Authority's First Written Questions. The Applicant agrees that the wording of paragraph 5.2.14 of **7.6 Outline Public Rights of Way Management Plan [APP-329]** would benefit from clarification to avoid ambiguity and considers the proposed amendment to be acceptable. Accordingly, paragraph 5.2.14 has been amended at Deadline 4 to read: *'All signage would be removed once construction is complete in the area, and all PRoW returned to their previous use, alignment and condition unless agreement has been reached with the LHA and landowners or where the project proposes to permanently divert a PRoW.'* The Applicant also notes Essex County Council's request for written assurance that the design of Public Right of Way (PRoW) diversions associated with the permanent private access road between Bentley Road and Ardleigh Road will be discussed and agreed with the PRoW Team at Essex County Council. The Applicant agrees that this assurance should be clearly set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]** and has included a new paragraph, at Deadline 4, following paragraph 8.7.2, adopting the intent of Essex County Council's suggested wording but applying it consistently across the Project to all Local Highway Authorities, as follows: *'The designs associated with the permanent stopping up and diversion of PRoWs will be discussed and agreed with the relevant Local Highway Authority.'* The Applicant further notes the duplication within paragraph 4.1.3 and confirms that this has been removed as part of the wider set of amendments. These changes have been incorporated into an updated version of **7.6 Outline Public Rights of Way Management Plan [APP-329]** submitted at Deadline 4.
			Norfolk County Council NCC highways have no proposed amendments for the outline PRoW Management Plan.	The Applicant notes the comment from Norfolk County Council and welcomes confirmation that no amendments are proposed to **7.6 Outline Public Rights of Way Management Plan [APP-329]**.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Thurrock Council In paragraph 6.5.1 of the Outline Public Rights of Way (PRoW) Management Plan it states "any PRoW that is affected by construction works, that has been confirmed as requiring reinstatement with the LHA, will be reinstated prior to reopening to the reasonable satisfaction of the LHA PRoW Officer." However, the Council requests that this should read as "any PRoW that is affected by construction works will be reinstated prior to reopening, to the reasonable satisfaction of the LHA PRoW Officer." This would ensure a clear commitment from National Grid in reinstating all PRoWs affected by construction works thus providing certainty for users and the Local Highway Authority.	The Applicant notes the wording provided by Thurrock Council in their response to the Examining Authority's First Written Questions. However, the wording currently included in paragraph 6.5.1 of **7.6 Outline Public Rights of Way Management Plan [APP-329]** is intended to acknowledge that permanently diverted Public Rights of Way (PRoWs) would not require reinstating, as they would not be reopened on their original alignment The Applicant therefore considers that an amended form of wording, which clarifies that the statement applies specifically to temporarily affected PRoWs, would be more appropriate. The Applicant has therefore amended the text to read: *'any PRoW that is temporarily affected by construction works will be reinstated prior to opening, to the reasonable satisfaction of the LHA PRoW Officer'.* This change has been incorporated into an updated version of **7.6 Outline Public Rights of Way Management Plan [APP-329]** submitted at Deadline 4.
			Suffolk County Council Paragraph 3.4 states that surveys were carried out late September 2024 and October 2024 also spring 2025. These dates do not appear to have included summer school holidays which would potentially record recreational use by locals and holiday makers. However, the PROW MP goes on to state the routes have all been assessed equally and routes managed regardless of PROW user trips. Paragraph 4.1.3 - Ensure temp surfacing is suitable for all user types. For example, road plate and horse etc. Paragraph 4.1.4 - SCC (PROW) welcomes the inclusion of phased closures and diversions to avoid diversions on diversion routes. Paragraph 5.1.3 should include a statement to say that routes should be reinstated in no less condition than before construction. Paragraph 5.2.5 - Signage to be prior agreed with the Local highway authority PROW and the local highway authority PROW should be advised in a timely manner prior to closures. Paragraph 5.2.15 - Shared access routes should be avoided for safety reasons of all user types and should be separated with fencing with adequate set back. where this is not possible all surfacing during and after construction must be kept to a safe and suitable standard for all users.	The Applicant notes the comments on **7.6 Outline Public Rights of Way Management Plan [APP-329]** provided by Suffolk County Council in relation in their response to the Examining Authority's First Written Questions and responds as follows: • Paragraph 3.4 – The Applicant notes the comment and no change is necessary • Paragraph 4.1.3 – The Applicant notes the comment and agrees that clarification would be beneficial. The Applicant has amended the text at the end of the fourth sentence to read *'…can be reopened. At these locations temporary surfacing will be provided that is appropriate for the anticipated PRoW user types, for example non-slip surfaces suitable for equestrians on bridleways, 'road plates' or other measures.*' • Paragraph 4.1.4 – The Applicant notes the comment and no change is necessary • Paragraph 5.1.3 – The Applicant notes the comment and confirms that the requirement for Public Rights of Way (PRoWs) to be reinstated to a condition no worse than prior to construction is already set out in paragraph 5.2.14 and within the Glossary definition of 'Reinstatement'. Notwithstanding this, the Applicant agrees that additional clarity would be helpful and has amended paragraph 5.1.3 to include the wording:

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Paragraph 5.2.2 - The Local Highway Authority should be advised, in its PROW function, in a timely manner prior to temp diversions or closures. Regarding paragraph 6.1.1, it would be preferable if the text read existing widths of PROW (as per definitive map statement) or this ensures that the existing widths are taken from the definitive statement (if available) and not from walked widths on the ground.	*'…after completion of construction works to their previous use, alignment and condition informed by pre-commencement condition surveys.'* • Paragraph 5.2.5 – The Applicant notes the comment and confirms that the requirement for signage to be agreed with the Local Highway Authority PRoW Officer is already addressed in paragraph 5.2.8. To provide additional clarity, the Applicant has amended the second sentence of paragraph 5.2.8 from '*discussed with*' to '*discussed and agreed with*'. The Applicant further notes that the requirement to notify the Local Highway Authority in a timely manner prior to closures is already addressed in paragraph 5.2.27 • Paragraph 5.2.15 – The Applicant notes the comment and has amended the opening text to: *'Shared routes will generally be avoided wherever possible. Where shared routes are required, and at PRoW crossing points, where construction traffic...'* The Applicant also notes that Paragraph 5.2.16 already confirms that separation and demarcation (likely fencing) will be used in some cases. Notwithstanding this, the Applicant has added the following sentence at the end of paragraph 5.2.15 for clarity: *'Surfacing will be maintained in a safe and suitable condition for the anticipated PRoW user types.'* • Paragraph 5.2.2 – The Applicant notes the comment and confirms that the requirement to advise the Local Highway Authority, in its PRoW function, in a timely manner prior to temporary closures or diversions is already addressed in paragraph 5.2.27. No amendment is therefore proposed • Paragraph 6.1.1 – The Applicant notes the comment but considers that amending the text to rely solely on widths stated in the Definitive Map Statement could be interpreted as requiring the Main Works Contractor to widen all affected PRoWs to those widths. This could include routes that have historically been narrower than the Definitive Map Statement width due to site constraints. Such an approach could result in unnecessary additional environmental impacts, including vegetation clearance or tree removal. The Applicant therefore considers that the current wording provides an appropriate and proportionate commitment, in that any diverted PRoW would be provided at the minimum widths set out in Section 6.1, while PRoWs managed on their existing alignment would be maintained at their existing widths. This

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				approach ensures the needs of users are met without introducing avoidable environmental effects. Notwithstanding this, the Applicant has amended the end of paragraph 6.3.2 to clarify that pre-commencement condition surveys may be used to agree, with the Local Highway Authority PRoW Officer, the widths of PRoWs to be maintained during construction: *'They will include agreeing the widths of PRoWs to be maintained during construction, with any proposed widening subject to appropriate assessment and agreement, including consideration of potential environmental impacts.'* These changes have been incorporated into an updated version of **7.6 Outline Public Rights of Way Management Plan [APP-329]** submitted at Deadline 4.
PRoW 1.2	Norfolk CC Suffolk CC Essex CC Thurrock Council	**PRoW general - 2** ES Chapter 16 **[APP-039]** paragraph 16.4.15 details the PRoW user surveys carried out. Confirm that these baseline surveys are accepted and if not, why not.	**Essex County Council** ECC can confirm that the baseline PROW user surveys are acceptable. **Norfolk County Council** NCC highways accept the baseline surveys. **Thurrock Council** The user surveys were carried out during cold weather potentially resulting in reduced recorded usage and thus not showing an accurate representation of all PRoW users. The Outline PRoW Management Plan commits to keeping all PRoWs open for use, as far as reasonably practicable, and this is demonstrated throughout the plan. The surveys and the management plan seem to contradict each other. The surveys emphasise the reduced usage identified but this seems to be superseded by the overarching commitment to maintain PRoW availability. The Council questions this inconsistency therefore the Council accepts the baseline surveys but with reservations.	The Applicant notes the comment and welcomes agreement on this matter. The Applicant notes the comment. Within Section 4.9 of **7.11 Transport Assessment [APP-333]** long distance trails, recreational circular routes or Local Planning Authority promoted routes that overlap with the Project were selected to collect user surveys for walkers, cyclists and horse riders. These surveys were undertaken in September/October 2024. This methodology and selected routes were shared with Thurrock at thematic and regional group meetings. Following tailored engagement with Thurrock Highways and Public Right of Way (PRoW) officers it was agreed that user surveys would be undertaken on four selected PRoW footpaths and on Hoford Road. Although these routes were not necessarily long distance trails or key recreational/circular routes, they were selected by Thurrock as they were deemed to provide an insight into usage. Due to land access permissions, and the time of year, it was considered more preferable to delay the surveys until the spring (March 2025) where the weather would be more favourable. As stated in paragraph 16.4.31 of **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]** the Applicant notes that the number of users of the PRoW may be higher in the spring/summer months when the weather is more favourable and daylight hours are greater.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				The number of users of PRoWs were not a pre-requisite for the assessment of pedestrian, cyclist and horse rider delay, with the methodology to determine magnitude of impact (change) shown in Table 16.5 Assessment of environmental effects and magnitude of impact of **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]**. However, user surveys were considered where applicable for any temporary closures of PRoWs or planned diversion routes. As stated in paragraph 3.4.1 of **7.6 Outline Public Rights of Way Management Plan [APP-329]**, usage has not been factored into the management regimes being considered for each PRoW. Instead, the approach to management regimes has been to minimise disruption to PRoW users as far as practicable and to keep PRoWs open, or subject to minor diversions only, wherever possible.
			Suffolk County Council Paragraph 3.4 states that surveys were carried out late September 2024 and October 2024 also spring 2025. These dates do not appear to have included summer school holidays which would potentially record recreational use by locals and holiday makers. However, the PROWMP goes on to state the routes have all been assessed equally and routes managed regardless of PROW user trips.	The Applicant notes the comment. As stated in paragraph 3.4.1 of **7.6 Outline Public Rights of Way Management Plan [APP-329]**, usage has not been factored into the management regimes being considered for each Public Right of Way (PRoW). Instead, the approach to management regimes has been to minimise disruption to PRoW users as far as practicable and to keep PRoWs open, or subject to minor diversions only, wherever possible. The number of users of PRoWs were not a pre-requisite for the assessment of pedestrian, cyclist and horse rider delay, with the methodology to determine magnitude of impact (change) shown in Table 16.5 Assessment of environmental effects and magnitude of impact of **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]**. However, user surveys were considered where applicable for any temporary closures of PRoW or planned diversion routes**.** As stated in paragraph 16.4.31 of **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]** the Applicant notes that the number of users of the PRoW may be higher in the spring/summer months when the weather is more favourable and daylight hours are greater.
PRoW 1.10	Essex CC	**Mitigation for all PRoW routes that cross or enter the highway network along the primary access routes.** Essex CC in its RR **[RR-1083]** refer to mitigation for all PRoW routes that cross or enter the highway network along the Primary Access Routes. Can you clarify what mitigation measures you are seeking in this regard and	**Essex County Council** ECC requires warning signage and vegetation clearance for all PRoW routes that cross or enter onto the carriageway of the Primary Access Routes. The Applicant has included this type of mitigation for various PRoWs in Table A16.4.5 of the ES Chapter but ECC	The Applicant notes this comment and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges. Where supplementary mitigation measures are proposed these

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		how such mitigation should be secured. In responding to this question please bear in mind relevant tests (eg where such mitigation to be secured by requirement would it meet the relevant tests (necessity, relevant to planning; relevant to the development permitted; enforceability; precision; and reasonable in all other respects))?	determined that there were some routes missing on the PARs identified in the LIR at Paragraph 4.5.87 – replicated below for ease of reference: • PAR 39 Great Tey Road • PAR 41 Witham Road (B1018) • PAR 51 Roxwell Road ECC would expect that the mitigation is captured in the CTMP and CoCP in line with the PRoWs already identified by the Applicant.	will be captured within Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision C]**.
PRoW 1.11	The applicant Essex CC	**Permanently stopping up and diversions of PRoW.** Essex CC raises concern regarding proposals to include permanently stopping up and diversions of PRoW, albeit no specific details have been provided at this stage. It raises concerns around the impact on the PRoW network and seeks more surety on the design and protection of rights (**[RR-1083]**, Paragraph 6.5.11). The applicant and Essex CC are asked for an update on these matters and any discussions taking place between them.	**Essex County Council** The concerns were around existing PRoWs Little Bromley 13 and 14 which are impacted by the private haul road running between Bentley Road and Ardleigh Road. The Applicant confirmed that the stopping up and diversions of these routes are included in the TRO schedules in the DCO. They provided verbal assurance that there would be sufficient space to provide the changes to the PRoW on either side of the private haul road and that it would be the subject of detailed design post DCO. We would request that the above assurance is captured in writing within the PRoW Management Plan as summarised in our response above to PRoW 1.1.	The Applicant notes Essex County Council's comments regarding Little Bromley Footpaths 13 and 14 and the interaction with the proposed permanent private access road between Bentley Road and Ardleigh Road. The Applicant confirms that the assurance sought by Essex County Council is addressed through the Applicant's response to Essex County Council's response to PRoW 1.1 above, which confirms that the design associated with permanent stopping up and diversion of Public Rights of Way (PRoWs) will be discussed and agreed with the relevant Local Highway Authority and that appropriate wording in this regard has been included in an update to **7.6 Outline Public Rights of Way Management Plan [APP-329]** submitted at Deadline 4.

16. Safety and security

Table 16.1 Safety and security

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
SS 1.4	Suffolk Constabulary Essex Police	**Emergency services – mitigation** Please review and provide comments on the applicant's response to your submissions at OFH1 [REP1-140] and [REP2-023], in particular regarding your requests for proposed mitigation beyond what is set out in the outline CoCP appendix E (community engagement and public information) [APP-305] and the outline construction traffic management plan [APP-309] (including an incident management plan).	**Essex Police and Suffolk Constabulary** The Joint Forces have reviewed the Applicant's responses and are clear that, whilst the outline Code of Construction Practice appendix E (CoCP - APP305) and outline Construction Traffic Management Plan (CTMP - APP309) set a broad framework, they fundamentally fail to secure the policing critical mitigations required for safe implementation of the Project. These mitigation requirements have been consistently and clearly communicated by the Joint Forces through pre-application and examination stage representations and engagement. In summary: • The outline CTMP makes no reference to the role of the Police in implementation and enforcement of traffic management measures. This omission is unacceptable. The Applicant appears to imply that it will be able to enforce traffic measures without police involvement, which is factually and legally incorrect. All impacted police forces will bear the responsibility for enforcing and implementing traffic management measures, and the Joint Forces are deeply concerned that this fundamental reality is not acknowledged. • The Joint Forces note that the Outline CTMP's provisions on AIL movements are wholly inadequate, being limited to high-level notification and embargo adherence rather than secured mitigation. The CTMP states that blue-light services will be given written notification of AIL deliveries and kept informed, and that any local embargo hours will be adhered to unless agreed otherwise. Notification alone is not mitigation and does not address the operational and legal controls required for high-risk AIL movements. • The CTMP records an assumption that certain loads may require both private escort vehicles and police escort, and that escort requirements may "vary" pending further clarification. This is wholly insufficient for examination purposes and cannot be left unresolved. The CTMP does not set out the criteria for determining when a movement requires a police escort, the police role in agreeing escort requirements and operational feasibility, nor the lawful basis for any	*Role of the Police* **7.3 Outline Construction Traffic Management Plan [Revision C]** will be updated to more clearly distinguish between **implementation** and **statutory enforcement** of traffic management measures and to more clearly set out the roles of the Police and the Main Works Contractor(s). The Applicant does **not** imply that it can exercise Police powers; enforcement of road traffic offences remains a matter for the appropriate enforcement bodies, including the Police. The Applicant also draws attention to Article 49 (Traffic regulation) of **3.1 Draft Development Consent Order [Revision D]**. Paragraph (4) of Article 49 states that the undertaker must not exercise the powers in paragraphs (1), (2) or (3) of Article 49 unless it has given not less than four weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated. *Operational and Legal Controls and Escort Requirements* The Applicant proposes to enter into a binding contract with Essex Police and Suffolk Constabulary, which will govern the operational detail of AIL movements, including notice periods and Police escort requirements. *Police Escort Requirements and Resourcing* **7.3 Outline Construction Traffic Management Plan [Revision C]** will be updated to clarify escort requirements. The Applicant acknowledges that where a police escort is required for safety and lawful traffic control, there is no alternative. The Applicant's position is that Police escort requirements and associated necessary and proportionate resourcing costs incurred by the Joint Forces where they relate to non-core policing activities that are necessary for the Project, are most appropriately secured through a binding contractual mechanism with the Joint Forces. *Requests for Pre-commencement Incident Response and Management Plan, Security Partnership Working Group and Dedicated Community Liaison Officer* The Applicant is considering these requests and is engaging with the Joint Forces and will update its position on these matters in the draft Statements of

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			dynamic traffic control measures required to move these loads safely on live networks. • The Joint Forces each have a statutory duty to uphold the law and protect the community. Where an AIL movement requires dynamic traffic control (including stopping or directing traffic/pedestrians, managing live carriageways, or other manoeuvres requiring police powers and exemptions), there is no lawful alternative to police escorting. This is not a matter of preference; it is a matter of law. When escorting AIL's, the Joint Forces exercise powers including (but not limited to): – Section 163, Road Traffic Act 1988 – power to stop vehicles – Section 37, Road Traffic Act 1988 – power to direct pedestrians – Regulation 12, Motorways Traffic Regulations 1982 – control of motorway lanes – Section 87, Road Traffic Regulation Act 1984 – police exemptions from speed limits These powers are not available to private escorts or Community Safety Accreditation Scheme (CSAS) personnel. Any attempt to manage live traffic without such authority would be unlawful and unsafe. Where a police escort is required for safety and lawful traffic control, there is no alternative - this, together with resourcing for the Joint Forces, must be explicitly secured through the DCO/Deed of Planning Obligation and cannot under any circumstances be left to assumptions or informal arrangements. • The outline CTMP signposts an Incident Management Plan, but this is not yet sufficiently detailed to evaluate from a policing perspective. The Joint Forces require that the Applicant secures a pre-commencement incident response and management plan to include construction phase incident management and community impacts such as protest-related activity, wilful obstruction of highway and road traffic collisions, and any other factors which will lead to increased police/emergency service demand, requiring mitigation, management and monitoring measures. This is not a request that can be deferred; it is essential to the safe delivery of the Project.	Common Ground with the Joint Forces to be submitted at or before Deadline 6.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• The Joint Forces further require a Security Partnership Working Group to be established to ensure the management of such aspects during the construction phases, with the relevant local police forces secured as a mandatory stakeholder. • The Joint Forces acknowledge the communication proposals set out in the Outline CoCP Appendix E (Community Engagement and Public Information). While Appendix E provides a baseline level of community relations, public information, and outline complaints procedure, it is plainly insufficient to secure the specific measures required to support public confidence, mitigate avoidable policing demand, and ensure safe and coordinated operations during the construction phase. The Joint Forces require that Appendix E (and the associated DCO Requirements) be expanded to include a dedicated Community Liaison Officer to act as a key interface between the project, local communities and emergency services.	
SS 1.5	Norfolk Constabulary Suffolk Constabulary Essex Police East of England Ambulance Service NHS Trust	**Emergency services – legal agreement justification** The police forces and ambulance service are also asked to provide further justification for their request for a planning obligation (such as a section 106 agreement) and what they would seek to be included in such an agreement, including how it would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010). Whilst this question is directed at those who have made a request for a legal agreement, Norfolk Constabulary are also invited to respond should they wish to do so.	**Chelmsford City Council** CCC raises no objection to an appropriately justified planning obligation for support for Emergency Services.	The Applicant notes the responses to question SS 1.5 made by Chelmsford City Council, Essex Police and Suffolk Constabulary. The Applicant notes that Norfolk Constabulary and the East of England Ambulance Service NHS Trust have not provided responses. The Applicant's position is that Police escort requirements and associated necessary and proportionate costs incurred by the Police where they relate to non-core policing activities that are necessary for the Project, including AIL Police escort services, are most appropriately secured through a binding contractual mechanism with the Joint Forces. The Police Act 1996 provides a specific statutory mechanism for charging for special police services such as AIL Police escort services. Securing such costs through a planning obligation would duplicate an existing statutory regime.
			Essex Police and Suffolk Constabulary The police forces and ambulance service are also asked to provide further justification for their request for a planning obligation (such as a section 106 agreement) and what they would seek to be included in such an agreement, including how it would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010). Whilst this question is directed at those who have made a request for a legal agreement, Norfolk Constabulary are also invited to respond should they wish to do so.	The Applicant's position is that Police escort requirements and associated necessary and proportionate costs incurred by the Police where they relate to non-core policing activities that are necessary for the Project, including AIL Police escort services, are most appropriately secured through a binding contractual mechanism with the Joint Forces. The Police Act 1996 provides a specific statutory mechanism for charging for special police services such as AIL Police escort services. Securing such costs

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			The Joint Police Forces require a planning obligation to ensure that the Project can be delivered lawfully and safely, without diverting core policing resources away from existing public protection duties. Elements of the Project include the transporting of abnormal indivisible loads on the public highway. Certain of those AILs can only lawfully be escorted by police officers. It is not an optional enhancement but a prerequisite for lawful delivery of the Project. Where Abnormal Indivisible Load (AIL) movements require a police escort, the escort activity cannot lawfully be undertaken by private escorts or other third parties. The safe execution of such movements requires the exercise of statutory traffic control powers and exemptions that can only be exercised by warranted police officers. This function cannot be delegated and cannot be absorbed within existing policing resources, which are already operating at full capacity The purpose of the planning obligation is therefore to secure and fund a dedicated police AIL escort capability, including the required lead-in and stand-down periods, officers/staff, vehicles, training, and associated operational costs, solely attributable to the Project. Given the absence of detailed data, particularly in relation to the Port of Origin (i.e. where the AILs will need escorting from), neither of the Joint Forces can estimate the scale of resource required.	through a planning obligation would duplicate an existing statutory regime
			The request meets the legal and policy tests of Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 58 of the National Planning Policy Framework: • Necessary to make the development acceptable in planning terms: Where police escort for AIL movements is required, it is the only lawful means of delivering the movement safely. Without a police escort, the movements cannot proceed. • Directly related to the development: Resourcing is determined from impact data provided by the Applicant. All costs arise solely from project-driven police escort AIL movements and related risks. • Fairly and reasonably related in scale and kind to the development: Costs will be based on an agreed resourcing model aligned to confirmed AIL movements requiring police escort. Without such a planning obligation, the Joint Forces will not be in a position to deliver the policing required for the Project and the Applicant will be unable to lawfully deliver AIL movements requiring police escort.	The Applicant does not consider it either necessary or appropriate to use a Section 106 agreement for this because Section 25 of the Police Act and the National Police Chiefs' Council's guidelines both say that at the relevant time a formal contract would be put in place, which would mean that the test of necessity is not passed.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			For information, Suffolk Constabulary faced a similar issue in relation to the proposed delivery of Sizewell C, although we note that the promotor of the Sizewell C scheme had provided extensive information in relation to the quantities of AILs requiring escorting. A detailed planning obligation entered into by the project developer of the Sizewell C project and relevant local planning authorities provided for the following insofar as relevant to the funding of the AIL escort teams to be provided by Suffolk Constabulary (note that the Sizewell Planning Obligation contained broader policing requirements, particularly in relation to community policing): 1. ProjectCo must fund Suffolk Constabulary's costs of escorting Abnormal Indivisible Loads (AILs) to the Sizewell C development site by road, with payments made via Suffolk County Council. 2. Initial annual payments of £1,643,226 are payable on or before commencement of the development and on each anniversary thereafter, to fund four AIL escort teams, until both the Sizewell Link Road and the Two Village Bypass are open to the public (these costs are an example only and should not be construed to represent the costs required for this project). 3. Project Co's maximum liability under the initial payment mechanism is capped at £10,000,000. 4. Transitional payment arrangements must be agreed between Project Co and Suffolk Constabulary at least 12 months before both roads open, to cover the remainder of the construction period based on likely escort costs. 5. Suffolk Constabulary has an 18-month mobilisation period following receipt of the first payment, during which it will recruit and train personnel, working closely with Project Co to provide escort services as soon as resources are available. 6. A review mechanism is triggered if both roads are not open by the fourth anniversary of the first payment. Project Co and Suffolk Constabulary must jointly review the payment provisions, having regard to project progress, unspent funds, agreed instalment levels, and anticipated escort requirements. 7. Suffolk Constabulary's obligation to provide escort teams falls away if both roads are not open by the sixth anniversary and the review (and any resulting adjusted funding) has not been completed and paid. 8. Dispute resolution is built in: if the parties cannot agree on adjusted payments within three months of the fourth anniversary, the matter is referred to the Transport Review Group (established by the Sizewell	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			C Planning Obligation), and ultimately (if unresolved within 30 Working Days) treated as a formal Dispute under the deed's dispute resolution clause. 9. Suffolk Constabulary's entitlement to enforce is conditional on it having entered into a Deed of Covenant with Project Co and the local planning authorities. 10. The Joint Forces recommend that regard be had to the experience from the Sizewell C Project in developing a suitable AIL mitigation and management framework for the Norwich to Tilbury Project	
SS 1.7	The applicant Defence Infrastructure Organisation	**Wattisham Station** Provide an update on the following issues: a) The effect of the proposed development upon the East 2 WAM Network Statutory Technical Safeguarding Zone, including both the disruption of the microwave link and the impact of any lateral tolerance changes to proposed pylons and OHLs. b) The results of the required recent assessments to consider the vertical and lateral limits of variation proposed in the siting and design of lattice towers as well as for cranage or temporal structures that may be used during construction in the statutory aerodrome safeguarding zone c) Confirmation of the mechanism/ how it will be secured in the DCO, or otherwise, to ensure that the proposed development will be submitted for inclusion on lower airspace chart, should consent be granted and how the Defence Infrastructure Organisation will be notified in advance of the deployment of cranes or temporal tall or narrow profile structures 50 metres or greater in height, including details of any aviation warning lighting with which they may be fitted.	**Defence Infrastructure Organisation** a) The Ministry of Defence (MOD) is currently completing detailed technical assessments to determine the extent to which the proposed installation of pylons and overhead lines, accounting for limits of variation, will impact upon microwave links that form part of the East 2 WAM Network. The outcome of these assessments is not yet available. b) The MOD is currently finalizing detailed assessments of effects of the proposed siting of pylons (accounting for vertical and lateral limits of variation), as well as impacts of the associated deployment of cranage, upon technical site zones and aerodrome obstacle limitation zones included in the statutory aerodrome safeguarding plan for Wattisham Station. The outcome of these assessments is not yet available. c) The MOD would propose including a dedicated Requirement in any DCO that may be granted to ensure relevant information is submitted for inclusion in lower airspace charts. In addition, a Requirement is expected to be needed to ensure the applicant liaises with the operator of Wattisham Sation to co-ordinate the deployment of cranes within the Wattisham Station statutory aerodrome safeguarding zone to maintain air safety requirements. For cranes/narrow profile structures 50 metres or greater in height to be deployed at locations outside of the Wattisham Station statutory aerodrome zone the applicant has identified they intend to provide relevant notifications to the Civil Aviation Authority (CAA) using the procedures set out in Civil Aviation Publication (CAP) 1068. Under this process the MOD will receive relevant information for the management of the UK Military Low Flying System.	On 24 April 2026 the Defence Infrastructure Organisation (DIO) advised the Applicant it had completed its assessments of Project impacts on defence safeguarded assets including the East2WAM Network regional air navigation system, and in relation to Wattisham Station aerodrome obstacle limitation surfaces (OLS) and Precision Approach Radar (PAR) navigational aid. They confirmed the assessments have taken account of the extent of the overhead line lateral and vertical Limits of Deviation (LoD). Further to the Issue Specific Hearing on 28 April 2025, the Applicant and the DIO have updated the **8.3.39 Draft Statement of Common Ground – MOD DIO (aviation safeguarding) [Revision A]** to jointly detail the conclusions of the Ministry of Defence (MoD) impact assessment, recognise the agreement of mitigation measures as the remaining matter under discussion, and summarise next steps for resolution, including the Applicant's review of the DIO's draft requirements to determine technical feasibility and confirm mechanisms for securing, as appropriate. Our response to Action 08 within **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]** provides further detail as requested by the Examining Authority. The principle matters are also summarised here: East 2 WAM Network Assessed impacts are associated with Project overhead line interfaces with microwave links within the East 2 WAM Network. The DIO has advised impacts can be mitigated by its requirement for restrictions to the height of Project infrastructure in two specific locations.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
				Wattisham Station DIO assessment conclusions are that the Project can impact a safeguarded slope of the aerodrome's PAR, as well as an area of its OLS. The DIO has advised these impacts can be mitigated by its requirement for the vertical LoD to be removed in three defined overhead line sections. Furthermore, the DIO has requested the establishment of a crane/temporal structure deployment protocol to ensure operator advance notification of works within the aerodrome statutory safeguarding zone to ensure compatibility with its operations. The DIO has confirmed that notification out with this zone would be via the CAA CAP1068 procedure. Military Low Flying Areas Further to commitment S06 within Table 6.1 of **7.2 Outline Code of Construction Practice [Revision D]**, the DIO has requested the inclusion of additional details to ensure changes to permanent Project structures (as a result of construction, modification or removal) can be accurately charted to enable timely aviation safety management. The DIO has confirmed it has no requirements for the installation of aviation warning lighting to Project infrastructure. Next Steps Subject to the Applicant's agreement to the above requirements, the DIO has confirmed the MoD would remove its current objection to the Project proposals. The Applicant is currently reviewing the technical feasibility of the requirements, including whether these are achievable within the Order Limits, as well as confirming the appropriate mechanisms for securing commitments as necessary. The Applicant and the DIO have agreed to meet at the earliest opportunity to discuss the results of the Applicant's review of the DIO requirements, and to agree appropriate mitigation measures and securing mechanisms.
SS 1.8	The applicant Tibenham Aerodrome Norfolk Gliding Club	**Tibenham Aerodrome** The submitted final **SoCG [REP1-105]** appears to still have many matters not agreed, with no matters showing as agreed. Furthermore, the applicant's	**Linda Smith** Point of information: Norfolk Gliding Club owns Tibenham Aerodrome so no distinction needs to be made. Comment: I understand that neither NGC nor PFA is able to make any progress on finalising an SoGC because NGET has failed to provide any relevant information,	The Applicant recognises Norfolk Gliding Club (NGC) is the Operator of the aerodrome and the agreed party for our engagement on aviation matters. The Applicant's response to Norfolk Gliding Club representation [REP3-126] within **8.4.9 Applicant's Comments on any Further Information or Submissions Received by**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		deadline 2 response [REP2-029] to Norfolk Gliding Club's WR [REP1-254] appears to not fully deal with the Gliding Club's concerns and provides more of a general response. To the applicant • Provide a more detailed response to [REP1-254] specifically responding to the issue of the Tibenham Aerodrome's 5km circular safeguarding zone and what this means in practice, both for the proposed development and for the operation of the Aerodrome with the proposed development in place. To the applicant and Norfolk Gliding Club • Provide any update to the previous SoCG [REP1-105] or when updates are likely to arise.	including information that they have requested relating to: the reasons for choosing a pylon route that passes so close to two busy airfields; the cost of the chosen route as compared with alternative routes; and aviation safety concerns. In particular, although NGET has relied heavily on a report made by Alan Stratford and Associates Ltd, it has failed to provide a copy of this to NGC or PFA, or indeed to the Planning Inspectorate (see SS1.6). Furthermore, NGET appears to misunderstand the distinction between questions of fact and opinion, refusing, for example, to accept that it did not consult NGC or PFA in 2022. Either a statement of fact is correct or it is not. There is no discussion to be had about it as NGET suggests.	**Deadline 3 [Revision A]** responds to the matters raised, including in relation to progression of the Statement of Common Ground being hindered by the NGC's perception of information being withheld, and the facts of the Applicant's non-statutory consultation in 2022. The Applicant's response to SS 1.6 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** makes clear that **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]** presents the findings of the technical impact assessments performed by Alan Stratford and Associates.

17. Socio-economics tourism and recreation

Table 17.1 Socio-economics tourism and recreation

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
SET 1.3	The applicant	**Key parameters for assessment and assumptions** **ES chapter 15 [APP-265]** at Paragraph 15.4.7 (Key Parameters for Assessment and Assumptions) indicates a number of assumptions based on National Grids previous experience of similar projects. For example construction workers who travel to the area (ie non local workers) the assumption is made that such workers would spend an average of £65 per day on accommodation, food and other local services. Furthermore, in terms of visitor accommodation bed space, the assumption is made that non local workers would use camping and caravan sites 50%; stay in short term let's 20%; would using hotels/ bed and breakfast facilities 20% and 10% would commute from home into the area. Please signpost where within the submitted documentation National Grids assumptions are evidenced (ie – what schemes constitutes National Grids previous experience of similar projects and what is the evidence that demonstrates the assumptions made) or provide such documentary evidence.	**Chelmsford City Council** CCC remains concerned that there is insufficient hotel accommodation within the Chelmsford administrative area, particularly when accounting for the cumulative effects of the development with other proposals.	The number of non-local construction workers requiring temporary accommodation is anticipated to peak at a maximum of 1,548 across the 180 km Project at any one time under a worst-case scenario, based on the assumption that up to 90% of the construction workforce would be non-local. Based on experience from comparable projects, it is highly unlikely that workers would occupy accommodation on a single-occupancy basis. It is more probable that accommodation would be shared. Furthermore, short-term accommodation is expected to be distributed across locations within the district or wider county, reflecting the linear nature of the construction activity and the progressive movement of works along the route. The data for these assumptions came from previous construction projects, including Hinkley C Connection Project and Richborough Connection Project as stated in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, SET 1.6.
SET 1.5	The applicant Relevant local authorities	**Mitigation measures - 2** The ExA notes the use of the term 'where practicable' in relation to proposed mitigation and is concerned as to the vagueness of this term. Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly. Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.	**Essex County Council** ECC has reviewed the use of 'where practicable" in ES Chapter 15 (Socio-economics, Recreation and Tourism) [APP-265] At Paragraph 15.6.6, there is reference to Standard Mitigation measures SO2 and SO3 contained in Table 6.1 of the outline Code of Construction Practice. In both these instances, ECC questions the use of 'where practicable' on the basis that alternative access arrangements be that in relation to road closures and mitigation or access to community facilities, business, tourism and recreational assets, need to be maintained at all times not just where practicable, unless this is agreed with the relevant highway authority or the affected community facilities, business, tourism and recreational asset. ECC is considering whether there is more appropriate alternative wording and will respond further at Deadline4. **Chelmsford City Council** CCC considers a definition of the term should be provided.	The use of 'where practicable' within the outline control documents is necessary in each instance of its use and a justification in the context of the Project for each case was submitted in the Applicant's response to SET 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The term reflects the status of the relevant detail, and appropriate flexibility, at this outline stage in the usual manner and falls to be considered alongside: • requirement 4 of **3.1 draft Development Consent Order [Revision D]** which requires that detailed control documents which are substantially in accordance with their relevant outline control document must be approved by the relevant planning authorities prior to commencement of the relevant stage of the authorised development; and • requirement 1(4) which states that where an approval is required under the terms of a requirement or document referred to in a requirement, approval may

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			An alternative form of wording could be "where reasonable", with a definition of what constitutes reasonable being appended to the DCO, or when relating to specific details, within the relevant documents containing details of the proposed mitigation. **Brentwood Borough Council** BBC does not consider that the use of the term "where practicable" is suitable for securing mitigation measures due to its vagueness and potential for withdrawal from commitment to provision of mitigation via a practicable loophole. BBC therefore supports Essex CC and other authorities along the route in securing an alternative form of wording that commits NGET to providing suitable mitigation and allows for no withdrawal from such commitment. **Norfolk County Council** NCC would be keen to understand why the applicant wishes to qualify mitigation measures in this way. NCC is familiar with the need for flexibility where measures are difficult to achieve, but in our experience a more appropriate way to enable this is to create a change management process (for example through the discharge of requirements or other post-consent mechanism) to ensure suitable scrutiny and that adjustments to the approach do not result in worse effects than assessed. In the case of PRoWs (see paragraph **15.6.6 of ES Chapter 15 [APP-265]**), NCC has made clear that closures, alterations or diversions must be subject to the consent of the street authority and also that alternative routes must be open and in place before closures. See the proposed amendments to article 16 in Table 4-A of **NCC's LIR [REP1-173]**. **Colchester City Council** The use of 'where practicable' is wholly unacceptable. It is vague, imprecise and most concerningly because of this it is completely unenforceable. Mitigation must be agreed and must be provided in complete accordance with the agreed details. **Thurrock Council** The Council agrees that the term "where practicable" may give rise to imprecise discretion for the Application. The use of the term should be justified in each instance. The Council suggests some alternative forms of wording. One option for suggested drafting may be that "where practicable" is "subject to" consultation with the local planning authority; for example, "where practicable, subject to prior approval by the Local Planning Authority."	only be given by the relevant planning authority where the authority is satisfied that the subject matter of the approval does not give rise to any new or materially different environmental effect. The term 'where practicable' is thus not the final word for the resulting mitigation measures to be set out in the detailed control documents, and would be constrained in the usual manner by the scope of environmental effects which have been assessed. In any event, the meaning of 'where practicable' in such documents has been rigorously scrutinised in a previous significant DCO examination and decision: the Sizewell C Project. As previously noted in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the explanation of the meaning of the term provided to the Examining Authority in the Project's planning statement by the Applicant in that case was as follows: *" 'Where practicable' means that the action should be done unless the degree of risk in a particular situation cannot be balanced against the time, trouble, cost and physical difficulty of taking measures to avoid the risk. In practice this means that something that would avoid a significant impact must be done in almost all circumstances. It would only be acceptable not to take the relevant step if there would not be a significant impact as a result, and therefore the risk would be low".* The Examining Authority welcomed the explanation, noted it was not appropriate for inclusion on the face of a statutory instrument such as the DCO and suggested it would be for the Secretary of State for Energy Security and Net Zero to determine if it were appropriate to include in the control document in question (the actual rather than outline code of construction practice) (see paragraph 9.1.15 of the Sizewell C Project's Examining Panel's Report to the Secretary of State) The Secretary of State, following a consultation on the use of the term (amongst other things) suggested by the Examining Authority, concluded that it was not appropriate or necessary for the definition to be further secured either through the DCO or any other mechanism (see paragraph 9.3.1.1 of the Sizewell C Project Secretary of State's Decision Letter). The Applicant agrees with the conclusions of the Secretary of State in that case and that they are also applicable here.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Alternatively, the drafting could also be so that "where practicable" is "subject to" consultation with the LPA, or prior notice to the LPA. These alternatives ensure that "practicable" mitigation measures have appropriate oversight and is focused primarily on addressing environmental effects and, following that, have regard to the efficiency of the project.	As such, the Applicant considers that this term is not vague but is justified in each instance and does not consider alternative wording to be appropriate or necessary.
			Braintree District Council The Council agree that 'where practicable' is vague. Clarity will be secured by details of mitigation being confirmed by the Applicant and thereafter not varied/deviated nor subject to non-provision for reason of issues of 'where practicable'. Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording. The Council suggest that the Applicant should confirm proposed mitigation – to be assessed by the ExA – with any reference to 'where practicable' deleted."	
			Babergh and Mid Suffolk District Council Defer to the response from SCC	
			Suffolk County Council SCC shares the Examining Authority's concern regarding the repeated use of the term "where practicable" in relation to mitigation measures set out in Chapter 15 of the Environmental Statement. SCC considers this term to be insufficiently precise for mitigation relied upon within the ES and therefore problematic in the context of a Development Consent Order. The phrase "where practicable" is not defined, is not bounded by objective criteria, and is open to subjective interpretation by the Applicant or its contractors once consent is granted. In the absence of a clear definition or decision-making framework, it is not possible to determine under what circumstances mitigation would not be delivered, nor how any decision to depart from mitigation would be justified, documented or monitored. This lack of certainty undermines confidence in the robustness of the assessment at the ES stage and creates clear risks in relation to enforcement and compliance post-consent. From SCC's perspective, mitigation which is relied upon to support conclusions of non-significant e ects must be specific, certain, enforceable and capable of monitoring, in line with established EIA and DCO principles. The continued use of "where practicable" risks reducing mitigation to an aspiration rather than a secured	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			commitment, which in turn weakens the evidential basis on which those conclusions have been reached. SCC therefore recommends that "where practicable" is replaced with the following wording: "Will be implemented except where it can be demonstrated, to the satisfaction of the relevant local authority, that it is not feasible, in which case an alternative measure providing equivalent mitigation will be delivered." SCC considers this wording to provide the necessary clarity and accountability. It establishes implementation of mitigation as the default position, requires the Applicant to justify any departure, requires oversight and agreement from the relevant local authority, and ensures that mitigation is not omitted but replaced by measures delivering equivalent outcomes. This approach is consistent with established DCO practice and ensures that mitigation relied upon within the ES is clear, enforceable and capable of effective monitoring. For mitigation measures that address significant or potentially significant effects, SCC further considers that such commitments should be secured through a Requirement or approved management plan, rather than being qualified by open-ended caveats. **Tendring District Council** TDC has reviewed the use of 'where practicable" in **ES Chapter 15 (Socio-economics, Recreation and Tourism) [APP-265]** At Paragraph 15.6.6, there is reference to Standard Mitigation measures SO2 and SO3 contained in Table 6.1 of the outline Code of Construction Practice. In both these instances, TDC questions the use of 'where practicable' on the basis that alternative access arrangements be that in relation to road closures and mitigation or access to community facilities, business, tourism and recreational assets, need to be maintained at all times not just where practicable, unless this is agreed with the relevant highway authority or the affected community facilities, business, tourism and recreational asset. TDC is considering whether there is more appropriate alternative wording and will respond further at Deadline 4.	
SET 1.14.(1)	The applicant Essex CC	**Concerns of ARU Writtle, Anglia Ruskin University and Writtle College Limited** At Deadline 1 **ARU Writtle, Anglia Ruskin University and Writtle College Limited [REP1-200]** highlighted concerns regarding the statutory safeguarding of children	**Essex County Council** ECC would defer to Anglia Ruskin University, as operators of the campus, to provide detailed justification on the safeguarding implications of the routing of an access through the campus for construction access. As	Please see response to ARU Writtle below.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
	ARU Writtle Anglia Ruskin University Writtle College Ltd All other Interested Parties	and physical collision risks between horses and construction vehicles and between pedestrians and construction vehicles. This issue was raised under the heading of socio economic effects, but could be attributed to other headings, such as Transport and Traffic for example. The ExA seeks written submissions, supported by evidence, from all IPs in regard to these matters that sets out their concerns/ position in regard to these matters. The ExA would especially request submissions from the above named educational establishments, Essex CC and the applicant.	set out in **ECC's LIR [REPI-161]** at Paragraphs 4.8,19 &4.8.19, ECC recognises the potential adverse impact on the safe operation of the campus and the need for any such access to be appropriately mitigated through the adherence to agreed and robust management protocols. CWL is not part of the Primary Access Routes network and consequently, the impact on using this route for construction access has not been considered nor has information been provided by the Applicant to explain the scope and level of use which enable the ECC to determine acceptability. It is understood the use of CWL is limited prior to construction of haul roads but without detail, acceptability cannot be accessed. It is noted that the red line of the DCO boundary includes a private road within Writtle College which does not form part of the adopted highway. There is no suggestion that Cow Watering Lane (which is classified as an adopted road) is to be used as a Primary Access Route for construction vehicles by the Applicant. However, if this access is to be used by construction vehicles then ECC would be interested to understand further details as ECC were not aware that it has been defined for construction access. If this access is to be used then ECC would request further confirmation on all other construction routes that are to be used but not defined as PARs so that ECC can review. ECC as highway authority would not be involved in discussions between the private landowner and National Grid in relation to the use of a private road. However, ECC would have an interest in the use of the private road/Cow Watering Lane junction. ECC would be involved in discussions around PRoW that runs over private land. The footpath (Writtle 13) is assumed to be within the grounds of the college (although ECC do not have exact boundary information for the college). The red line boundary includes sections of the footpath although does not appear to show that the haul road interacts with it. The PRoW Management Plan shows how interactions between users of the PRoW and construction vehicles will be dealt with and ECC have accepted this high level approach to the network. However, if users of the route are aware of specific issues that need to be addressed that are not covered by this high level approach then ECC would be interested to understand so that ECC can discuss appropriate mitigation with the Applicant.	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Chelmsford City Council CCC has met with ARU Writtle and the Applicant to discuss this matter and acknowledges ARU's concerns. CCC ask that ARU's detailed concerns regarding safeguarding and collision risks are taken in to account. CCC suggests that specialist advice is obtained separately from the relevant regulatory bodies with regard to the acceptability of accessing the site through College grounds. To avoid such conflicts, CCC suggests that an alternative route be found within the locality. Should no route be found, further requirement and clarify is needed on the level and the nature of the use of the access through the College. It would helpful if this was provided by the Applicant during the examination. In the event that details are not forthcoming, CCC recommends that a requirement relating to the operation and use of the access through the College is submitted to and approved in writing by the LPA in consultation with the highway authority. These arrangements should be shared with ARU Writtle prior to submission of the requirement.	Please see response to ARU Writtle below.
			Birketts LLP on behalf of Anglia Ruskin University & Writtle College Limited As the Examining Authority ("EXA") sets out ARU submitted at Deadline 1 **[REP1-200]** written representations supported by witness statements and other evidence regarding ARU Writtle's concerns that should the Scheme come forwards as proposed and operate as and when proposed and most notably if the Proposed Overhead Line Crossing Protection Access Route (Document APP-133 Proposed Project Design Section F) becomes operational and used that this will detrimentally impact the statutory safeguarding of the children it teaches, the provision of education, the danger of collision risks between horses and construction vehicles, the danger of collision risks between pedestrians, children and construction vehicles and other educational and statutory obligations and duties that ARU is required to strictly adhere to as well as detrimentally impact the operation and running of the business of ARU as an educational institution, resulting in the potential cessation of education provision and the business. ARU also submitted at Deadline 1 that alternative routes and land use for the Proposed Overhead Line Crossing Protection Access Route should be utilized by NGET which would avoid the Proposed Overhead Line Crossing Protection Access Route running through the center of a	The Applicant provided a detailed response to the Deadline 1 submission by ARU Writtle **[REP1-200]** at Deadline 3, in **8.8.1.1 Addendum to Applicant's Comments on Written Representations [REP3-073]**. The Applicant acknowledges that ARU Writtle would not have had sight of that response prior to submitting their Deadline 3 submission responding to this Written Question. The Applicant also notes that its own response to this Written Question deferred to that submission, and therefore reiterates that **8.8.1.1 Addendum to Applicant's Comments on Written Representations [REP3-073]** contains the relevant detailed response. Furthermore, the matter was discussed at Issue Specific Hearing 2 on 30 April 2026 and the Applicant has provided a response relating to traffic management for horse riders in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [Revision A]**. In summary. the Applicant is proposing to route approximately two construction vehicles through the Campus, across the construction programme, for the purpose of erecting scaffold. Scaffold is proposed to be delivered to the relevant scaffold-tower via Cow Watering Lane. The intention would be for the scaffold to be manually lifted over the fence into the Equine Facility where the construction vehicles would then erect the tower. Once the stringing activities are complete,

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			fully operational education campus providing education to children. ARU proposed one such alternative route (ARU Writtle Savills Land App Plan) to NGET but NGET has not sufficiently considered this or any alternative routes to avoid collision risks, danger and impact on ARU with the route of the current Proposed Overhead Line Crossing Protection Access Route. We agree with the EXA that the above issues are issues of socio-economic effects and we also agree that these can be attributed to Transport and Traffic; Design, parameters and other details of the proposed development; Alternatives, Compulsory Acquisition, Health and Wellbeing and Safety and Security (to use the headings provided by the ExA). We also have strong concerns with Noise and Vibration. We submit that the issues and evidence raised within ARU's submission at Deadline 1 stand, with no comment or response from the NGET to address any of these issues. We therefore request that these issues be addressed at the hearings week commencing 27 April 2026. At Deadline 1 ARU also requested a single Issue Specific Hearing in respect of the statutory safeguarding of children and physical collision risks between horses and construction vehicles and between pedestrians and construction vehicles. This was in light of the NGET's proposal to have the Proposed Overhead Line Crossing Protection Access Route run through the educational campus of ARU (the "ARU Writtle Campus"); we therefore request that these issues are addressed at an Issue Specific Hearing. Should the ExA or NGET have further requests for more details, questions and evidence than has been provided in ARU's Deadline 1 Written Submissions, ARU would be more than happy to provide this information as soon as practicable to aid with any understanding and to progress a solution with the NGET during the course of the examination. We will be able to provide further valuable information during the Accompanied Site Inspection to which we insist the ExA proceeds with at the ARU Writtle Campus in order to see the true impacts of the proposed scheme at the ARU Writtle Campus. ALTERNATIVE ROUTE - PROPOSED OVERHEAD LINE CROSSING PROTECTION ACCESS ROUTE ARU submitted at Deadline 1 that alternative accessway routes should be diligently reviewed and considered by the NGET and the ExA as there is no valid basis for the proposed accessway through the ARU Writtle Campus when other accessway routes could be achieved which	construction vehicles would access the campus again to dismantle the scaffold-tower. The Applicant and affected party (AP) met on 15 April 2026 to discuss the impact of the Project on the campus, with particular focus on construction access, routeing and operational effects. ARU reiterated its concern that the proposed access arrangements through the Equine Facility would give rise to safety, welfare and operational impacts for students, staff and horses, consistent with its Written Representations. The Applicant outlined the current design position, confirming that alternative access options and refinements are under consideration, including opportunities to avoid routeing through the campus where practicable, although no alternative has yet been agreed pending further discussions with the highway authority and the AP. The discussions included considerations about construction requirements, such as scaffolding, traffic management, and programme uncertainty, as well as future maintenance access and coordination with statutory undertaker works. The conversation also addressed potential future uses of drones and helicopters for survey purposes when the overhead line becomes operational. The Applicant confirmed that restrictions could be implemented over the campus to ensure the safety of both students and horses. In response to several points discussed at the site visit, the Applicant and the Main Works Contractor are considering further options for providing access to the scaffolding site, utilising the TROs proposed in Schedule 13 of **3.1 Draft Development Consent Order [Revision D]**. The Applicant will continue to work with the AP and Essex County Council on this matter. The Applicant acknowledges the submission of two appendices to this submission and comments as follows: Appendix A: Explanatory Paper of North-West And South-West Chelmsford Parishes Group The Applicant acknowledges the support of ARU Writtle to the position of the North-West and South-West Chelmsford Parishes Group, including to their proposed alternative routeing known as 'Corridors L and Q'. The Applicant has responded to the Parishes Group on this matter in the following submissions to date: • **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, page 277

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			do not disrupt the educational facilities and endanger children, students, employees, visitors and horses. Due to lack of engagement, responses or commentary from NGET, ARU has now instructed KMC Transport Planning Ltd to prepare a technical note reviewing the NGET's proposed use of the ARU Writtle Campus, a high-level review of potential alternative access arrangements and Recommendations on actions to mitigate impacts on ARU (the "Technical Note"). We annex the Technical Note to this submission. The Technical Note confirms that the proposed use of the ARU Writtle Campus by the Proposed Scheme increases the likelihood of conflict and increased risk of collisions. ARU has serious concerns as to the danger that the proposed scheme will result into children, students, employees and any persons attending the ARU Writtle Campus. The Technical Note also sets out the missing assessment of traffic movements, conflicts, collisions, movement and dangers by NGET of the proposed scheme at the ARU Writtle Campus. The Technical Note sets out alternative routes that NGET must assess and provide their assessments for comment to ARU and the ExA. ARU retains its position that the only way to mitigate the dangers and risk of collision to children, students and horses at the ARU Writtle Campus is to move the Proposed Overhead Line Crossing Protection Access Route to a new alternative location and amend the scheme accordingly. NORTH-WEST AND SOUTH-WEST CHELMSFORD PARISHES GROUP ARU has had the benefit of considering the submissions of the North-West and South-West Chelmsford Parishes Group (F53AF0A8A) and is supportive of the position that they take. Please find enclosed at Appendix A ARU's position on this in full. SUMMARY ARU requests that the Applicant now fully considers ARU Writtle's Deadline 1 submission, this Deadline 3 submission and all alternative routes for the Proposed Overhead Line Crossing Protection Access Route. An alternative route is the only course of action to mitigate or remove the danger to children, students, employees and horses. There is no other mitigation or plan that the Applicant could provide that would remove the danger to children, students, employees and horses.	• **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**, pages 653 to 654 • **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [Revision A]** (this deadline, Deadline 4). The Applicant's position remains that whilst this alternative has been considered, there are technical constraints and environmental effects that do not justify a change, and the preferred alignment is that as proposed in the Project. KMC Transport Planning Ltd Technical Note The Applicant has reviewed the technical note and will respond to the specific items raised following the planned further conversations with the AP and Essex County Council.

18. Traffic and transport

Table 18.1 Traffic and transport

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
TT 1.9	National Highways	**Baseline data - 9** In the applicants response to RRs **[REP1-132]** in reply to your request for microsimulation modelling (paragraph 4.2.29 of your RR [RR-2657]) it considers the local junction modelling undertaken to be proportionate. Please can you confirm if you now accept this in light of further meetings which the applicant has detailed.	**National Highways** NH does not agree with the applicant's position not to use microsimulation to model the impact of the proposed development at the A120 / Long Green / B11018 / Cressing Road (Galley's Corner), A120 / A131 / B1256 (Marks Farm), and B1018 / Millenium Way roundabouts. This is due to the forecast volume of additional traffic associated with the proposed development and the duration of the impact. Further discussion is required with the applicant and this is being scheduled for as soon as practicable.	The Applicant is continuing to engage with National Highways regarding the modelling required for the A120 / Long Green / B11018 / Cressing Road (Galley's Corner), A120 / A131 / B1256 (Marks Farm), and B1018 / Millenium Way roundabouts. The Applicant understands that National Highways hold a micro-simulation model that could be used to further assess these junctions. A meeting is to be arranged with National Highways to discuss the way forward with the aim of agreement during the examination process.
TT 1.12	The applicant	**Junction and link capacity - 1** There are a number of junctions which are predicted to be overcapacity and for which mitigation has not been agreed with the local highway authority. Please detail which junctions remain with mitigation to be agreed and the status of negotiations in this regard.	**Holton St Mary Parish Council** The access road to the proposed Sealing Compound at Notley Enterprise Park from the Junction of the B1070 with the A12 to the North of Holton St Mary and its associated bellmouth is unsatisfactory and will create continuing traffic problems as more than 36000 vehicles travel through that junction per week. Table 3.10 on Page 69 of Volume 6, Document 6.3 Chapter 3 states that the Cable Sealing Compound site preference is for Notley Enterprise Park. This would be connected to a new access road running just North of Holton St Mary Village (HSM) to the Four Sisters Junction with the A12 (Junction 31) that would require major modifications to the slip road, that appear not to be planned, a new bellmouth that would adversely affect two Listed buildings close by. Although the creation of this road rightly avoids traffic going along the very busy and unsuitable B1070 that runs through HSM, the Parish Council considers this to be sub-optimal as it is much too close to the village to mitigate noise, and dust, light pollution, traffic and concerns about the mental well-being of the residents in particular the 50 or so on the North side of the village through which some 36,000 vehicles already pass each week. HSM Parish Council has suggested on several occasions that the access road AND the Cable Sealing Compound north of the B1070 should be moved further North. Our specific proposal as outlined in our last representation is	National Grid has carefully considered the feedback received during the statutory consultation for this Primary Access Route for construction vehicles and has identified an opportunity to utilise an offline temporary haul road located east of Holton St Mary from the B1070 to the construction corridor. It is proposed that this route would act as a bypass for Holton St Mary during construction. Through this process, National Grid has also considered alternative routes for this bypass, including the use of the historic railway alignment. These alternatives were discounted through assessment and identification of constraints and requirements. These details are included in **5.1 Consultation Report [APP-066]**, with related items included in, but not limited to, reference numbers 9-4.221, and 10-33.10. Proposals for the B1070 junction with the A12 include upgrade works to the merge taper to extend the existing merge taper to meet Design Manual for Roads and Bridges CD 123[26] requirements. These works are supported by a temporary construction area located adjacent to the site to enable these upgrades to be completed.

[26] National Highways (2021) *Design Manual for Roads and Bridges, CD 123 Geometric design of at-grade priority and signal-controlled junctions*. Volume 2.1.0.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			that the new access road should be constructed from between junctions 32A and 32 B of the A12 North of Capel St Mary parallel to the disused railway line. This line leads to Hadleigh; North of Notley Enterprise Park and Raydon airfield so, the last pylon should be moved further to the Northeast and the Cable Sealing Compound moved appropriately. This is shown on the map below.[see *document]* This route is infinitely better as it would dramatically reduce the number of affected properties, is virtually all on field edges/headlands and with direct access to a grade separated junction at Capel St Mary only requiring a large bellmouth. Moreover, any adverse effects on the two Grade II Listed and other properties on the B1070 Northern slip-road to the A12 would be avoided as would be the requirement for a storage compound by the A12 there. It would appear that this alternative to the preferred location at Notley Enterprise Park was not considered at any time by the Applicant since no mention of this possibility appears to be contained in Document 6.3. Further, the Applicant has made no attempt to engage with the Parish Council about this. Therefore, HSM Parish Council, requests that an analysis of this alternative be made before any decision is reached. The area to the east of the village is part of the Suffolk Cycle Network and will be subject to regular closures.	
TT 1.17	The applicant Suffolk Constabulary Essex Police Norfolk Constabulary	**Abnormal indivisible loads – 3** Please confirm the status of negotiations regarding the resourcing of police support for AIL matters. This may be referenced to our question SS 1.5.	**Essex Police and Suffolk Constabulary** Engagement between the Applicant and the Joint Police Forces is ongoing; however, it must be clearly understood that negotiations cannot override legal requirements. Safe and lawful delivery of AIL movements requires a minimum 18-month stand-up period with any agreed solution secured well in advance of this to allow for governance, recruitment, training and operational planning. The above position has been consistently and repeatedly communicated by the Joint Forces to the Applicant, and remains non-negotiable. To date, the Joint Forces have been provided with only high-level and indicative AIL movement information, requiring significant assumptions regarding routing and load characteristics. Until confirmed ports of origin, final vehicle specifications, and movement schedules are provided, the Joint Forces cannot finalise risk assessments, operational feasibility, or undertake resource modelling. The continued absence of this information is a matter of serious concern and is impeding progress. The Joint Forces state unequivocally that:	As stated in the Applicant's response to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, negotiations are ongoing between the Applicant and the police forces regarding the resourcing of police support for AIL matters. The Applicant is seeking to reach agreement on this matter in advance of Deadline 7.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Where an AIL movement requires police escort, there is no lawful alternative available. • Private escorting cannot deliver the dynamic traffic control required for such movements. • Without appropriate mitigation and secured resourcing, the Joint Forces will be unable to deliver the policing required for the Project. • Police escorting via lawful Special Police Services arrangements is the only safe, proportionate and legally compliant solution for AIL movements that require police involvement. • There is no alternative mechanism available, and the Applicant must engage with this reality without further delay.	
TT 1.20	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council Suffolk Constabulary Essex Police	Cumulative impacts Are there any specific impacts from other projects which you consider could cause additional impacts and risk to the proposed development and do you consider these have these been addressed adequately by the applicant?	**Essex County Council** Work Programme • Timescales of works associated with other DCOs and strategic sites associated with consents under the Town & Country Planning Act. The Applicant has confirmed they will be adhering to the Permit Scheme. However, the risk is that multiple projects come forward at the same time requiring competing roadspace. In addition, multiple projects coming forward in the same areas of Essex will impact on particular sections of the local highway network. Therefore, ECC will want to ensure that the applicant commits to joining and engaging with the Developer's Forum on the basis of the high level approach set out in our response to TT 136 below and commits to flexibility to adapt to changing conditions. • ECC note the Applicant has provided conflicting responses on their commitment to joining and engaging in the Developer's Forum in their comments on the ECC Local Impact Report as follows: • Ref 3.18.54 (p124) states "The Applicant is already engaged with other developers, however ECC will consider the request for a Developer's Forum and engage with the local authorities accordingly." • Table 3.23, paragraph 4 (p158) states "However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate co-ordination." Maintenance • Maintenance of temporary pedestrian/cycle infrastructure for mitigation purposes on Bentley Road	Work Programme: The Applicant has committed to joining and engaging with the Developers Forum in paragraph 6.6.2 of **7.3 Outline Construction Traffic Management Plan [Revision C]**. Maintenance: The Applicant is liaising with Five Estuaries and North Falls so that it can provide ECC with clarity regarding proposed maintenance arrangements for the temporary pedestrian/cycle infrastructure on Bentley Road. The Applicant aims to provide this information to ECC at or before Deadline 6. AIL Strategy: The Applicant notes ECC's request for maps showing the AIL routes and constraint locations, and draws their attention to **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans Sections A-B and D-G [APP-312 to APP-319] and Sections C and H [Revision B]** which contain the information requested. The Applicant has and will continue to engage with ECC on this matter. With regards to the A120 National Highways project, the Applicant assumes this refers to the A120 Wix Bypass. The Applicant is aware of this scheme and has and will continue to engage with National Highways on the potential impact of this on AIL routes.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			by multiple DCOs. In ECC's LIR (REP1-161) it stated that "The completion of works and maintenance timescale is more complex due to the need for multiple DCOs to use the proposed infrastructure. Further clarity is required on how these matters will be managed and evidence in the form of a collaborative agreement between the various DCOs benefiting from the proposed mitigation". • The Applicant has responded to say they do not consider it appropriate to have a commitment in the DCO that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. This is understood but does not lessen our concern about who is ultimately responsible for maintenance during the works – for example where there is an overlap in programmes for the various DCOs or where there are gaps between works and the mitigation is to remain in place rather than removed and then reinstalled. Therefore, ECC feel the approach to managing the mitigation strategy for these temporary works is not sufficient to allay our concerns. AIL Strategy • ECC has raised concerns around a co-ordinated approach to workable AIL routes and that ECC would expect the review to have been completed prior to the end of the Examination so that workable AIL routes are defined. The applicant has confirmed their Contractor is aiming to complete this by the end of Examination assuming all relevant information is provided from the asset owners in a timely manner. Whilst ECC understand the caveat around ensuring sufficient information is available ECC believe that a position statement could be provided showing the routes on a map along with constraints as currently known (if not all information is available). This will enable an understanding of where there are particular issues on the network that need further work and how this impacts the various authority areas. • ECC note that the A12 restrictions do not impact the AILs and as such there is no requirement to propose routing through Colchester (which is very welcomed). ECC has, however, noted that there is a National Highways project committed between 2026-2031 on the A120 which impacts the use of the Harwich Port AIL route. ECC would be interested to understand whether discussions have been held with National Highways around any restrictions they will be	

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<tr><th>Reference</th><th>Question Addressed to</th><th>Question</th><th>Response from interested parties or affected person</th><th>Applicant’s Comment</th></tr>
<tr><td></td><td></td><td></td><td>imposing on this particular route and how this may impact on AILs through Essex.</td><td></td></tr>
<tr><td></td><td></td><td></td><td>Norfolk County Council
NCC highways officers have had discussions with the applicant with regards to cumulative traffic impacts with other major schemes or NSIPs in the area. NCC feel that the applicant has addressed this adequately.</td><td>Noted.</td></tr>
<tr><td></td><td></td><td></td><td>Thurrock Council
The Council has assessed the Applicant's study of projects that may cause impacts to the proposed development. First, the Council identifies those developments the Applicant chose to exclude from the assessment before explaining the Council’s assessment of the Applicant’s approach to the cumulative impacts of the LTC DCO.
Excluded Schemes
Two-tier increase in demand has been considered in the study, comprising annual TEMPRO growth rates being incorporated into the traffic modelling and impact assessment, and the inclusion of committed developments. This is generally considered robust and a standard practice.
A total of 29 committed developments within Thurrock were considered as potentially likely to impact the National Grid scheme in terms of background traffic levels. Of those, 12 developments were selected for further analysis of cumulative impact and for modelling as part of the Transport Assessment. The remaining 17 schemes were excluded from the assessment. The key reasons given for exclusion of schemes were:
• Sites not adjoining the PAR network
• Unclear whether programme of construction/operational demand will coincide with the National Grid construction movements
• Lack of demand distribution data available for a scheme
Of the excluded schemes, of particular note are the following schemes:
<table><tr><th>Development</th><th>Impact</th></tr><tr><td>Ref 15/00205/OUT to the east of Corringham, 750 units residential-led mixed use scheme</td><td>5km west of PAR64-65 with construction and operational demand likely to rely on the A13. Potential for impact on Norwich to Tilbury unless National Grid construction is</td></tr></table></td><td>The Applicant notes the concern about the potential impact of the listed planning applications in combination with the Project. Details of these developments and the reason for exclusion are summarised below:
• 15/00205/OUT Land Adjacent A13 Railway Line and Southend Road Corringham Essex. The planning application was excluded as there was no traffic information in the PARs or junctions. The Transport Assessment of this planning application provided flows associated with the development outside of the Project’s Study Area. Furthermore, it was withdrawn in May 2025.
• 19/01524/SCR Langdon Hills Golf and Country Club Lower Dunton Road Bulphan Essex RM14 3TY. The planning application was excluded as there were no traffic details from the Environmental Impact Assessment Screening Report. As it was concluded that an Environmental Impact Assessment was not required, no further details of traffic movements would be provided as part of this planning application.
• 23/00897/SCO Land Adjacent Sandown Road Collingwood Farm Quarry and East Quarry Stanford Road Orsett Essex. The planning application was excluded as there were no traffic details from the EIA Scoping Request. It was concluded that an EIA is required, however, no subsequent planning applications have been submitted.
• 25/00333/SCO Land East of Chadwell St Mary Brentwood Road Chadwell St Mary Essex. The planning application was excluded as there were no traffic details from the Environmental Impact Assessment Scoping Opinion. It was concluded that an EIA is required, however, no subsequent planning applications have been submitted.
The Applicant has estimated the cumulative flows for its assessment in 7.11 Transport Assessment [APP-333] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] based on publicly available information from the planning portal. Therefore,</td></tr>
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Reference	Question Addressed to	Question	Response from interested parties or affected person		Applicant's Comment
				completed prior to residential scheme construction start.	the listed planning applications did not provide sufficient details to consider any cumulative flows. Cumulative – LTC: The assessment presented in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. Health and wellbeing (including dust and noise): **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** considers the cumulative impacts from multiple projects on health and wellbeing (including impacts from dust and noise). LTC is one of the projects included in the cumulative assessment. The assessment concludes that air quality and noise effects on health and wellbeing are negligible and not significant. Construction noise: Residual noise effects as a result of construction traffic noise assessed in**6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** includes committed developments including LTC. The assessment concludes construction traffic noise impacts are negligible or small and therefore not significant on most routes. Construction dust: **6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]** considers the effects of construction dust associated with the construction phase. The assessment concludes that the effects of construction dust are anticipated to be not significant. Traffic and Transport: The Applicant has estimated the cumulative flows for its assessment in **7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** which was based on publicly available information for LTC. Following further engagement with the LTC Transport Team, more detailed traffic assignments were shared with the Project which reflected the change in the LTC programme stages. As such supplementary junction modelling has been undertaken post DCO submission. The findings of this modelling will be presented within an Addendum to **7.11 Transport Assessment [APP-333]** to be submitted at Deadline 5. A meeting with Thurrock Council and National Highways will be arranged to review the findings of the latest modelling assessments and mitigation. The Applicant will continue to work with LTC to ensure a
			Ref 19/01524/SCR Golf club redevelopment scheme on Lower Dunton Road	Significant scale of development directly on the National Grid corridor although not on a Primary Access Route (PAR)	
			Ref 23/00897/SCO 775-units residential-led mixed use scheme at Sandown Road, excluded as no details of demand distribution / programme are available at this stage.	Site adjacent to SRA and PARs 64, 65, 66 and 67. Significant scale of development, likely to impact traffic levels at A13 if construction or operational demand coincide with NG construction phases	
			Ref 25/00333/SCO 1,500-unit residential scheme east of Chadwell St Mary, excluded as no details of demand distribution / programme are available at this stage.	Site adjacent to National Grid terminus at Tilbury, impacting PAR 70 and 71. Potentially significant impact on NG construction traffic movements, should works commence simultaneously.	
			Accepting that there is a degree of uncertainty regarding the level of impact of the background demand schemes during NG construction, the schemes identified above, which have not been considered in the assessment, do have the potential to impact traffic levels and the road network during the NG works, through both their location in direct proximity to the scheme route/PAR and the significant scale of the proposals, with impact extending throughout construction and onto operational phases. Therefore, in a robust 'worst-case' assessment of impact, it would be recommended that those are included. It is noted that TEMPRO growth has been applied as part of the NG assessment, to address overall background traffic demand growth from 2023 to 2027 (6%) and 2031 (10%). This is considered a robust approach. The committed developments, which have been considered as part of the assessment were included using data presented in their respective Transport Impact Assessments which have undergone the planning approval process and are therefore deemed to be adequately considered. Lower Thames Crossing DCO 2025 The LTC DCO was granted consent in 2025. In the Council's LIR, the Council notes significant impact from the LTC from the following perspective:		

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			• Traffic and Transport – in Section 6.1, Highways and Transport of the Council's LIR it is mentioned that concurrent construction with both schemes would lead to an impact on the highway and local roads. • Health and Wellbeing - Paragraph 6.8.6 of the Council's LIR "The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. In response, the Council comment that while the applicant has undertaken a Cumulative Assessment the information from this has not been drawn through into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and this needs to be addressed to understand the potential cumulative impacts fully, particularly in relation to LTC." • Cumulative impact on noise and dust which could have an impact on local residents. • Surface Water and flooding - Paragraph 6.9.57 of the Council's LIR "The proposed Tilbury Substation is located in proximity to, and partially intersects with, the Order Limits of the LTC development. This area is identified as being highly susceptible to surface water flooding and is influenced by established overland flow paths. The combined effects of these major infrastructure could alter existing drainage patterns and increase runoff volumes if not carefully co-ordinated." The Applicant has assessed the cumulative impact in the ES - Applicant response – Chapter 4.8 page 330 of Applicant's response to LIR. "The Cumulative Effects chapter has assessed the potential inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in **6.17.A1 Appendix 17.1 – Inter-Project Cumulative Effects [APP-282]**. The assessment of clusters of other developments on common receptors can be found in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. No significant cumulative impacts relating to health and wellbeing have been identified." The Applicant's response to the cumulative effects issue raised in paragraph 6.11.20 of Thurrock Council's LIR is helpful but does not fully respond to the request to consider the national programme of development. The Applicant has stated they will monitor the emissions of this project and their overall corporate emissions however this does not encompass the full consideration	coordinated approach to construction traffic management as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan (Revision C).** The Applicant can confirm that the findings of the significance of effects within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** remain unchanged when considering the updated daily LTC traffic flows in combination with the Project. Surface water flooding: Engagement with LTC is ongoing. The current position is presented in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP1-075]**. The Applicant will continue to engage with LTC to develop proposals that ensure both projects are compatible and deliverable. GHG Assessment: Other major projects fall under the EIA Regulations and have therefore considered their impacts on climate as part of their own applications. In relation to National Grid projects this has included the commitments to reduce embodied carbon through the Greenhouse Gas Reduction strategies and at a corporate level as part of the Climate Transition Plan. This sets out National Grid's greenhouse gas reduction targets and how it plans to achieve net zero. This requires National Grid to monitor its performance and demonstrate progress to the goals that have been set. This process ensures that emissions across National Grid's portfolio of projects are monitored across the country to ensure that greenhouse gas emissions are reduced.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			of the 'in-combination' emissions of development across the country. For reference, Paragraph 6.11.20 of Thurrock Council's Local Impact Report: "As with all projects of this scale, the GHG assessment concludes that the Project's emissions are not material in isolation. However, the Council remains concerned about the cumulative effect of multiple similar scale projects across the country. NPS EN-1 recognises that clustering and "in-combination" effects should be considered. The Council would therefore welcome consideration of how this Project interfaces with the wider national programme of infrastructure developments in terms of cumulative embodied emissions and the monitoring of cumulative outcomes over time." National Grid's response, in 8.8.2 Applicant's Comments on Local Impact Reports: "The Applicant acknowledges that it progresses a programme of projects which will include embedded carbon emissions from the construction of its projects. At a national level, the Applicant monitors its Scope 3 emissions (which includes Construction and Maintenance of its energy infrastructure). Within our Climate Transition Plan 2023/202489 the Applicant has set commitments to reduce embedded carbon by driving efficiencies in the design phase of projects and working collaboratively with strategic suppliers to identify and trial innovative solutions to reduce construction impacts to net zero by 2050/51. In addition, the Applicant has committed to reducing greenhouse gas emissions which will be monitored as described in **7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308]**." As a result, the Council considers the potential cumulative impacts of the national programme of infrastructure development remain insufficiently addressed but recognise National Grid's commitment to monitor emissions of the proposed project. Overall, the Council does not believe the Applicant's response is adequate as it fails to represent the impact of the LTC on the proposed DCO and in some cases states that there are no impacts when the Council believes there are. The Council notes that there are ongoing conversations with National Highways to overcome some of the impacts however it would be helpful if the Council were provided with a summary of how these conversations are progressing and outcomes to issues raised.	

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			Essex Police and Suffolk Constabulary The Joint Police Forces identify significant and unresolved cumulative impacts arising from overlapping construction timetables with other major infrastructure projects, including the Lower Thames Crossing, Five Estuaries Offshore Wind Farm, Bramford to Twinstead, and North Falls Offshore Wind Farm (if consent is granted). Concurrent construction activity will result in increased HGV and AIL movements (including police-escorted AIL movements), additional road closures and diversions, and increased pressure on the strategic and local road networks. These cumulative effects will place substantial and potentially unmanageable additional demand on policing resources, incident **response** capability and emergency service access, particularly where multiple projects generate AIL movements requiring police escort at the same time. The Joint Forces are firmly of the view that these cumulative impacts have not been adequately addressed by the Applicant and this failure represents a material gap in the application. To ensure lawful and deliverable construction, the Applicant must, as a matter of urgency: • undertake explicit modelling of overlapping construction and AIL movement scenarios across projects; • clearly demonstrate how the Incident Management Plan and police resourcing arrangements will operate under cumulative stress; and • secure robust change-control and escalation procedures to prevent unmanaged overlap of high-risk movements Without these measures being secured, cumulative construction activity will materially increase risk to community safety and will render the Joint Forces unable to deliver the policing of the Project alongside other nationally significant developments.	The Applicant notes the Joint Police Forces' comments and will respond at Deadline 5. The Applicant also highlights that, pending completion of equipment procurement, it does not consider it to be reasonably possible to confirm the detailed inputs required to undertake the requested explicit modelling. This explicit modelling would also be dependent upon timely provision of information from other projects and the level of detail available at this stage.
			National Highways NH has considered the applicant's response provided within document [REP1-132] regarding the exclusion of Tendring Colchester Borders Garden Community, Norfolk Vanguard Wind Farm and Norfolk Boreas Wind Farm, and confirm that the exclusion of these projects is supported based on the rationale provided. NH also considers that the traffic associated with Bathside Bay	The Applicant notes National Highways' response and notes the potential overlap of the renewal of the concrete road on the A120 Wix Bypass. This has been added into the updated **7.3 Outline Construction Traffic Management Plan [Revision C]** that has been submitted at Deadline 4, and the Applicant will engage with the NH Concrete Roads team on the potential overlap of this project.

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			will have been included within the background traffic growth to an extent. NH notes that the Roads Investment Strategy 3: 2026-2031 was published on 26 March 2026 and includes funding for a large renewal of the concrete road on the A120 Wix Bypass. Whilst the project had not been confirmed prior to submission, NH wishes to highlight the potential for both schemes' delivery programmes to overlap. National Highways recommends liaising with the Concrete Roads team (via the NH Norwich to Tilbury DCO project team) to establish programme timings and seek to manage any interaction.	
			Suffolk County Council SCC has previously commented on cumulative effects in its **Joint LIR [REP1-178]**, paragraph 12.170 – 12.173.	Noted. The Applicant responded to this section of the council's Local Impact Report on pages 658 – 667 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
TT 1.28	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	**Walking, cycling and horse-riding – 1** Please confirm if you consider there are any outstanding parts of your highway network that require a Walking, Cycling and Horse-riding assessment review. If so, please list these and give the status of discussions with the applicant regarding this.	**Essex County Council** ECC does not believe there is a need for an assessment unless the applicant is proposing to use Cow Watering Lane for construction access via Writtle College (as referred to in SET 1.14). If there are other proposed site accesses using the local highway network beyond the defined PARs then ECC may require a review of these routes. It would be dependent on the construction traffic flows, type of vehicles and whether the route is on a defined PRoW or national cycle route, and/or whether there is potential for the presence of walkers, cyclists or horse riders on street associated with the PRoW network in the area. A referenced in ECC's response to SET 1.14 ECC would require further details of the usage of site access routes beyond the PARs defined to be able to assess.	The Applicant can confirm that Cow Watering Lane is not a designated Primary Access Route (PAR) to the Project as construction traffic would use site access point TB-B104 via Vicarage Road (PAR 52) to access the Project. Paragraph 5.4.2 of **7.3 Outline Construction Traffic Management Plan [Revision C]** provides detail where in certain limited instances, certain construction vehicles may use roads which are not designated as Primary Access Routes (PARs). Table 5.2 sets out the anticipated construction activities where this is likely to be the case. The construction vehicles cannot use the PARs in this instance, due to the isolated works away from the haul road and/or because the activities may need to be completed prior to the installation of the internal haul road, e.g. to assess ground conditions and undertake surveys.Cow Watering Lane is proposed to be an access route to allow overhead line scaffolding activities, with a small volume of construction vehicles accessing on Cow Watering Lane.
			Norfolk County Council The applicant has made appropriate assessment of the local network with regards to Walking, Cycling and Horse-riding. Please refer to PRoW general 1 and 2 for any other comments.	Noted.
			Thurrock Council The Council consider that it does not appear that any WCHARs (Walking, Cycling & Horse Riding Assessments) have been carried out on routes traversing the National Grid works or for works for access	**7.6 Outline Public Rights of Way Management Plan [Revision B]** contains a list of all PRoWs affected by the Project along with the management approach proposed for each and the timescales involved. The Project is temporary and we have liaised with Thurrock Council regarding proposed mitigation for PRoWs impacted by the Project. The impact on walkers,

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			arrangements. If this is the case, then it is recommended that these are carried out for the following PROWs: • 178 (Bridleway) • 91 (Footpath) • 10 (Footpath) • 102 (Footpath • 11 (Footpath) • 12 (Footpath) • 224 (Footpath • 41 (Footpath) • 42 (Footpath) • 45 (Footpath) • 46 (Footpath) • 105 (Footpath) • 61 (Footpath) • 63 (Bridleway – Cycleway) • 66 (Footpath) • 67 (Footpath) • 69 (Footpath) • 70 (Footpath) • 71 (Footpath) • 97 (Footpath) • 223 (Bridleway) And the following cycle routes • Hoford Road • Muckingford Road • Church Road The standard for WCHARs are set out in the Design Manual for Roads and Bridges (DMRB) document GG142 and the principles could be applied to the DCO scheme to formalise the assessment and identify milestones for subsequent review based on the works programme within Thurrock.	cyclists, and horse-riders (WCH) has been assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** which includes where PRoWs connect to the primary access routes. Furthermore, **7.6 Outline Public Rights of Way Management Plan [Revision B]** provides details of the management of PRoW affected by the Project. Along Muckingford Road Primary Access Route (PAR) 71 the total increase in traffic from the Project was 3% and no HGVs would be using this route. Therefore, the Applicant considers the impact to cyclists as minimal. The Applicant notes the cycle route that crosses PAR 63 Brentwood Road on Church Road, which has an uncontrolled crossing to allow cyclists to cross in two stages. On PAR 63 there would be 18 vehicle movements an hour, one vehicle every 3/4 minutes. As such, the Applicant considers there to be limited impact to cyclists and pedestrians crossing at this location. Hoford Road is a no-through road just west of Buckingham Hill Road. Access by WCH is permitted and as such the Applicant engaged with Thurrock Council which led to a temporary scheme for walkers and cyclists on Hoford Road being proposed. The Applicant therefore considers there is no requirement for a formal WCHAR to be undertaken. The Applicant will meet with Thurrock Council to discuss this mitigation with the aim of gaining agreement on mitigation and ensuring this is captured within the next iteration of **7.3 Outline Construction Traffic Management Plan [Revision C]**.
			National Highways NH notes that a WCHAR has been prepared for the following locations where permanent changes to the Strategic Road Network are proposed: • A120/ Bentley Road • A12 on slip at the A12 Ipswich Road/B1070 junction. NH require any temporary works in place for 6 months or longer to be treated as permanent and therefore require a WCHAR or a WCHAR exemption note, if appropriate.	The Applicant confirms that the WCHAR assessments will be issued to National Highways before Deadline 5.

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			The WCHARs have yet to be issued to National Highways. Once issued, NH will complete a review of the documents and will liaise with the applicant to address any comments that have been raised.	
			Suffolk County Council SCC will consider this matter further and respond at the next deadline.	Noted. The Applicant may comment upon receipt of the SCC response.
TT 1.29	The applicant	**Walking, cycling and horse-riding - 2** In their RRs **[RR-1190]**; **[RR-1205]**; and **[RR-1189]** students at Chelmer Valley High School state that due to the closure of local roads and paths, walking and cycling access to Chelmer Valley School will be compromised and more hazardous alternatives will be needed. This concern is repeated by a number of other RRs. Please explain if this location is covered in a walking, cycling, riding assessment report and if not, whether it should be; also give consideration and explain if a strategy is required for this school and other similar locations.	**Chelmsford City Council** CCC would welcome a strategy being created for the school and other locations as appropriate. CCC would recommend that the Applicant consults Chelmer Valley High School on this.	Noted. The Applicant provided a detailed response to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. Within this the Applicant stated that, while some temporary management and diversion of PRoWs are proposed, the PRoW network will remain open and connected and, whilst road closures are proposed, connectivity for pedestrians and cyclists accessing Chelmer Valley High School will be maintained. A Walking, Cycling and Horse-riding Assessment is not considered necessary for the Project due to the temporary nature of the impact. Paragraph 5.8.4 of **7.3 Outline Construction Traffic Management Plan [Revision C]** notes that it is anticipated that information on traffic management measures will be publicly available on the Project website and the relevant LHA website. This information would include detail of road closures. The Main Works Contractor(s) will implement a system to provide information to local residents and stakeholders about the works, which is expected to include schools within the affected areas.
TT 1.36	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	**Outline construction traffic management plan - 2** For the avoidance of doubt, please detail any matters in the outline **CTMP [APP-309]** which you consider requires amending and your proposed amendment. This could be in the form of a schedule or tracked changed version of the outline CTMP.	**Essex County Council** • Paragraph 2.3.5 to be updated and moved to below 2.3.7 (under Heavey Goods Vehicle Timings): Existing Wording – Where a PAR is located directly past Freeman Primary School (Stow Upland) and Margaretting Church of England Primary School (Margaretting), construction vehicles will travel outside the weekday drop off/pick up times. Proposed Wording – The Contractor(s) commits to restricting HGV movements during school drop off/pick up times on PARs where there is school related activity for the following locations: ○ Quilters Infant & Junior School, Billericay, A129 and A176 ○ Billericay School (secondary), A129 and A176 ○ Cressing Primary School, B1018, Tye Green	The Applicant has reviewed the wording proposed by ECC. **7.3 Outline Construction Traffic Management Plan [Revision C]** has been updated to incorporate this wording as detailed below and submitted at Deadline 4. For those items not included, the Applicant will continue to engage on these with ECC. Paragraph 2.3.5 The Applicant has updated paragraph 2.3.5 in **7.3 Outline Construction Traffic Management Plan [Revision C]** to add part of the proposed wording provided by ECC to the end of the paragraph, namely '*A further review will be undertaken and agreed with the Local Highway Authority prior to construction to consider restrictions on routes where any new schools have been built*'. The Applicant has updated **7.3 Outline Construction Traffic Management Plan [Revision C]** accordingly.

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			○ Maltings Academy (secondary) and Powers Hall Academy (primary), Spinks Lane/Spa Road, Wickham ○ Margaretting Church of England Primary School, B1002, Margaretting – A further review will be undertaken and agreed with the LHA prior to construction to consider restrictions on routes where any new schools have been built. • Include the following in a new section 3.4 (after Community Engagement and Public Information) – National Grid and the Main Contractor(s) commit to joining and positively engaging with a Developer's Forum on the basis of the following high level principles: ○ The Developer's Forum would be a regular monthly online meeting beginning as soon as the DCO is granted. It would be chaired by ECC with key members of the other NSIP Teams invited as well as other Strategic Site Teams, alongside relevant members of the Local Highway Authority and Planning Authority ○ The Forum would be attended by National Grid as scheme promoter alongside their Main Contractor(s) constructing the scheme ○ At critical times where programmes overlap National Grid and the Main Contractor(s) will attend more regular weekly or bi-weekly meetings for urgent discussions on collaboration ○ Funding will be provided for the time spent by ECC in organising and chairing the meetings over the life of the construction period of Norwich to Tilbury capped at £45,360 (based on monthly meetings) with any additional meetings charged at £105 per person ○ Commitment to provide flexibility to adapt to changing conditions as identified during the Developers Forum • Update paragraph 5.2.2: Existing Wording – Pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. The scope of these surveys (in terms of the routes covered, and the methodology of these surveys) is to be agreed	The Applicant has undertaken a review of all schools listed by ECC and provided a detailed response within **8.4.1 Applicant's Comments on Relevant Representations [REP2-030]** as to why the schools noted by ECC have not been subject to restrictions in relation to HGV movements during school drop off / pick up times. However, the Applicant has agreed to undertake site observations at the schools listed by ECC during school drop-off and pick-ups to confirm site conditions. The Applicant will continue to engage with ECC and will keep this matter under review. Section 3.4 The Applicant provided an update to **7.3 Outline Construction Traffic Management Plan [REP3-028]** at Deadline 3. This revised version of the document includes a commitment to engaging with the Developers Forum in paragraph 6.6.2. The Applicant will continue to liaise with ECC on the requirements for the Developers Forum, with detail to be provided within the Final CTMP. Regarding funding, the Applicant committed in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** to begin discussions with the host local highway authorities and National Highways on the recovery of appropriate costs through a Planning Performance Agreement (PPA). Paragraph 5.2.2 Road safety on the Primary Access Routes, including the interaction of construction traffic with vulnerable users was considered with the **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]** and **7.11 Transport Assessment [APP-333]**. Therefore, the Applicant does not consider that a formal Road Safety Review is required on the PARs prior to works commencing. However, the Applicant acknowledges the concerns raised by Essex and will complete a drive through of all the PARs with the LHAs with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. Prior to AIL movements, a review of structures will be completed to ensure suitability of the route.

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			with each LHA. The results of these pre-condition surveys will be shared with the LHA prior to works commencing, including pre-commencement works relating to the highway. Proposed Wording – Pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. The scope of these surveys (in terms of the routes covered, and the methodology of these surveys) is to be agreed with each LHA. The results of these pre-condition surveys will be shared with the LHA prior to works commencing, including pre-commencement works relating to the highway. In addition to condition surveys, a road safety review including structures should be undertaken prior to works commencing. This would include a drive through of all the PARs with the LHA to identify any issues that may need to be rectified prior to use and a review of the structures used to ensure they are still appropriate for the intensification of use. It is anticipated that the rural routes will be the focus of the safety review. – At the end of Paragraph 5.3.12 include: ○ Variable Messaging Sign boards are to be implemented at locations agreed with the Local Highway Authority to communicate upcoming AILs or other disruption on the PARs. – To include the following after paragraph 5.3.13: ○ Information will be made available to the wider community on what AILs are, why they are needed and how they impact the local/strategic road network along with links to find further information. – To include the following update to paragraph 5.4.17: Existing Wording ○ "The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 7. Given the robust arrangements that would be available to monitor and review these traffic movements, the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary."	The Applicant has updated paragraph 5.2.3 of **7.3 Outline Construction Traffic Management Plan [Revision C]** as follows: '*Prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. It is anticipated that the rural routes will be the focus of the drive through survey. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP.*' The Applicant has already committed to undertake pre- and post-construction condition surveys on AIL and HGV routes. It will also commit in **7.3 Outline Construction Traffic Management Plan [Revision D]** at Deadline 5 to carrying out targeted condition surveys on the PARs on a quarterly basis during construction. The Applicant will continue to liaise with ECC regarding this matter. Paragraph 5.3.12 The Applicant has added an additional commitment in Section 5.3 of **7.3 Outline Construction Traffic Management Plan [Revision C]** after the existing paragraph 5.3.12 stating '*Variable Messaging Sign (VMS) boards will be implemented at locations agreed with the Local Highway Authority and National Highways to communicate upcoming AIL movements and/or other disruptions to PARs.*' Paragraph 5.3.13 The Applicant has added an additional commitment in Section 5.3 of **7.3 Outline Construction Traffic Management Plan [Revision C]** after the existing paragraph 5.3.13 stating '*Information will be made available to the wider community on what AILs are, why they are needed and how they impact the local/strategic road network along with links to find further information.*'

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			Proposed Wording ○ The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed." • Paragraph 5.4.10 Existing Wording – The timescales for the implementation of these schemes is subject to change. The CTMP will need to be reviewed and amended in engagement with the relevant LHA should planned highway works impacts have a material effect on the agreed construction routeing strategy. Proposed Wording – The timescales for the implementation of these schemes is subject to change. The CTMP will need to be reviewed and amended in agreement with the relevant LHA should planned highway works or other external factors have a material effect on the agreed construction routeing strategy. In this way, the Contractor is providing a flexible approach to respond to changes in conditions. • Table 5.7 to be amended to include commitments to restrict the use of construction routes during school drop off/pick up as set out above. • Insert the following at Section 5.4: Reducing Freight – The Contractor will review and discuss ways of reducing freight by road with the Local Highway Authority. This will include (but not restricted to): ○ consolidation centres: ○ shared delivery logistics with other scheme promoters/developers; ○ wider considerations of the Multi Modal Strategy using rail and port facilities to replace long distance road freight; and ○ review of 'just in time' scenario (Scenario 2) set out in Appendix G of the Transport Assessment. – Update	Paragraph 5.4.17 (now paragraph 5.4.18) The Applicant has added an additional commitment in paragraph 5.4.18 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to detail that the monitoring and management system will be compared against the assumptions used with **7.11 Transport Assessment [APP-333]** and the Environmental Statement. This monitoring system will enable the Main Works Contractor to notify the LHAs where there may be short term localised increases to agree mitigation proactively in advance. Paragraph 5.4.10 (now paragraph 5.4.11) The Applicant notes Essex County Council's comment. The text currently provided within paragraph 5.4.10 of **7.3 Outline Construction Traffic Management Plan [Revision C]** provides inherent flexibility, and as such the additional text is not proposed to be added. Table 5.7 The Applicant has reviewed schools located in the vicinity of the PARs and, due to the low expected Project construction traffic during the predicted peak weeks of the construction programme and the risk associated with the level of interaction between construction vehicles and vulnerable users, the Applicant considers that restricting HGV movements during school start/finish periods is not necessary. However, the Applicant has agreed to undertake site observations at the schools listed by ECC during school drop-off and pick-ups to provide confidence to the Local Highway Authority that restrictions are not necessary on the adjacent/nearby Primary Access Routes. Section 5.4 The Applicant has reviewed the proposed text on additional commitments to reducing freight trips on the road network. The Applicant has responded to the ExA's question TT1.11 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, detailing the design decisions to reduce HGV movements. In line with EN-1 policy, the Applicant has developed a multi-modal strategy to reduce the distance travelled by HGV trips on the road network. The volumes of materials assessed on the PARs, detailed within **7.11 Transport Assessment [APP-333]**, are representative of the worst-case deliveries to site per day, and the multi-modal front-

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			○ Staff working hours will be 07:00 to 19:00 Monday to Friday and Saturday 08:00 to 13:00. ○ Staff will be unable to access the on-site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs • After paragraph 5.4.10 – To reduce the potential for impacts on the local highway network due to inappropriate HGV parking associated with lack of nearby resting facilities for drivers, baseline conditions will be collected prior to works commencing. The conditions will be monitored and reviewed using parking usage surveys for areas defined with the LHA through a scoping process. This will include laybys and industrial estates where clusters of HGV parking are identified, along with observations of other local roads where HGV drivers park and rest. This would be in areas on the local highway network along or within close proximity to the construction routes to determine any potential HGV parking issues. Mitigation would be considered in advance of construction works where necessary and agreed with the LHA. Depending on the results, the mitigation could either be implemented or a monitor and manage approach adopted with regular reviews at the key locations undertaken during the construction period. • Include after paragraph 5.5.5 to ensure parking provision is in line with the assumptions in the assessment: – As part of the access design approvals details of car parking supply and demand for compounds will be provided along with cycle parking. • Include after paragraph 5.8.4: – Access is required 24/7 to the Ardleigh Depot in Essex without hindrance for all vehicle types including a snow plough as worst case. It is noted that there are to be no delays to access/egress or on the surrounding local roads leading to the wider network as it will impact on road safety where ECC respond to emergency incidents on the local highway network. • Include the following at paragraph 5.9.5 Existing Wording – These mitigation measures will be in place for the duration of the Project and removed at the end of	loaded strategy will not provide an increase in trip volumes. The Applicant has provided a response to the proposed working hours in the Applicant's response to question DCO1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** Paragraph 5.4.10 HGV Driver facility surveys – the Applicant is considering the request and will continue to engage with Essex on this matter. Paragraph 5.5.5 The Applicant notes the request to include the following text in **7.3 Outline Construction Traffic Management Plan [Revision C]** after paragraph 5.5.5 to ensure parking provision is in line with the assumptions in the assessment: '*As part of the access design approvals details of car parking supply and demand for compounds will be provided along with cycle parking*'. The additional text is not proposed to be included, for the reasons detailed below. Sufficient parking for construction workers is expected to be provided at worksites and the level of provision will be refined during the detailed design phase. As noted in **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, staff parking at the construction compounds for the Project will be limited and all spaces will be allocated. Dedicated visitor parking spaces are expected to be provided at all compound locations. It is anticipated that these are clearly marked and monitored by the Travel Plan Coordinator to ensure they are not used by construction staff. However, the final levels of provision will be determined by the Main Works Contractor. Paragraph 5.8.4 A new paragraph has been added into the **7.3 Outline Construction Traffic Management Plan [Revision C]** that states: *Before carrying out any works with a potential to affect access to the Essex County Council Depot in Ardleigh, National Grid/the Main Works Contractor(s) will develop and agree with Essex County Council details of measures to ensure that access is maintained at all times to the depot; or where this is not reasonably practicable,*

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			the Project, with land reinstated to its previous condition (as far as is reasonably practical). Proposed Wording – These mitigation measures will be in place for the duration of the Project and removed at the end of the Project (unless agreed otherwise with the LPA), with land reinstated to its previous condition (as far as is reasonably practical). • Add in between paragraphs 5.9.5 and 5.9.6 – Locations such as but not limited to Bentley Road, Ardleigh (Essex) that are proposed to be permanently provided will require a comprehensive investigation of the construction of the carriageway to inform the subsequent detailed design of the works. • Include after paragraph 5.12.1 to ensure the LHA is consulted and agrees with the design of the changes to the PRoW around the permanent private haul road in Ardleigh: – The design of the interaction between the diversions of the PRoW around the private haul road in Ardleigh are to be agreed with the Local Highway Authority. • Table 6.1 at "Monitoring of vehicles and road network" to include: – Monitoring vehicle movements of HGVs and construction workers. • The applicant should set out some examples of corrective actions that could be taken. ECC have included some in the proposed wording below to be provided after paragraph 6.3.1. Proposed – Where needed corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. These actions could include: ○ Extending the programme of works to reduce the impact of traffic; ○ Warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site; and further disciplinary actions as necessary for repeated incidents ○ Closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or	*that a suitable alternative access is provided and operational prior to any interruption of the existing access. National Grid/the Main Works Contractor(s) will provide reasonable advance notice of any proposed temporary road closures or traffic management measures that may affect access to the depot, including details of anticipated impacts on access and response times.* Paragraph 5.9.5 The Applicant notes the request from Essex County Council to update paragraph 5.9.5 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to update paragraph 5.9.5 to read "*These mitigation measures will be in place for the duration of the Project and removed at the end of the Project (unless otherwise agreed with the LHA or National Highways and subject always to the Applicant and/or the Main Works Contractor first securing all necessary consents and other approvals required for the permanent retention of those mitigation measures), with land reinstated to its previous condition (as far as is reasonably practical).* " The Applicant has updated the document to reflect this wording. Paragraphs 5.9.5 and 5.9.6 The Applicant notes the request from Essex County Council and has added the following text into **7.3 Outline Construction Traffic Management Plan [Revision C]** between paragraphs 5.9.5 and 5.9.6: '*Locations of proposed permanent mitigation, such as but not limited to Bentley Road, Ardleigh (Essex), will require a comprehensive investigation of the construction of the carriageway to inform the subsequent detailed design of the works."* . Paragraph 5.12.1 The Applicant notes the request from Essex County Council to add new text after paragraph 5.12.1 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to read '*The designs associated with the permanent stopping up and diversion of PRoWs will be discussed and agreed with the Local Highway Authority.*' The Applicant has updated the document to reflect this wording. Table 6.1 The Applicant has committed to undertaking checks to monitor the numbers of vehicle movements in paragraph

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			○ Implementing additional shuttle buses to reduce worker traffic. • Update the list of non-compliance at Section 6.4.1 as follows: Existing Wording – Construction traffic operating outside the agreed hours Proposed Wording – Construction traffic (including workers) operating outside the agreed hours. • The list of non-compliance at Section 6.4.1 to include: Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES	6.2.6 and as such, the requirement is committed within the document. The monitoring of LGV and car usage, for information such as car parking, occupancy rates and timings, is detailed within **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**. Paragraph 6.3.1 The Applicant notes the request from Essex County Council on proposed actions for non-compliance. The Applicant has added paragraph 6.3.2 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to detail that further sanctions will be included within the final version of the CTMP. Paragraph 6.4.1 The Applicant and the appointed Main Works Contractor(s) have to be compliant with all commitments detailed within **7.3 Outline Construction Traffic Management Plan [Revision C]**. The Applicant notes the request from Essex County Council to update the wording in the third bullet in paragraph 6.4.1 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to read '*Construction traffic (including workers) operating outside the agreed hours*'. The Applicant has updated the document to reflect this wording. As noted above, the requirement to monitor and manage the vehicle movements against those assumed in the Transport Assessment and Environmental Statement are captured as a commitment in paragraph 5.4.18 of **7.3 Outline Construction Traffic Management Plan [Revision C]**.
			Norfolk County Council Norfolk County Council highways have reviewed the outline CTMP and have the following comments to make: 2.3.1 and 2.3.2 As per the highway team's response to the DCO documentation, the scheme working hours should be Monday-Friday 07:00 – 19:00 and Saturdays 07:00 – 13:00 only. No working on Sundays or Bank holidays subject to operations outside core working hours. 2.3.6 As per comment for 2.3.1 and 2.3.2. 2.3.7	2.3.1, 2.3.2 and 2.3.6 The Applicant has provided a response to the proposed working hours in the Applicant's response to question DCO1.S10, as provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. 2.3.7 The Applicant has provided a response to the proposed traffic volumes through Diss and the mitigation proposed in the Applicant's response to question TT1.14, as provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant will continue to liaise with Norfolk County Council on the proposals. The Applicant will issue the additional

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Diss access strategy still has not been confirmed with NCC highways. The proposed traffic numbers for off-peak HGV numbers through Diss are still a concern. Applicant should be submitting more information for NCC highways to access. 5.4.13 Norfolk County Council's peak hours should start at 07:30. 5.4.23 Semi-permanent signage (over 18 months) – posts will be required, which will need permits etc. 5.7.11 The highway team still haven't confirmed that a split between Diss and Thetford is acceptable. The highway team would be content for LGVs to travel on the A1066, as RG56 will be a satellite compound and most peak traffic flows will be off-peak. Table 5.9 Proposed Junction Capacity Mitigation Measures Sites 6 to 15 all refer to accessing via Diss, this route has not been confirmed. 4. The Highway Authority would add that any works, whether inside or outside the order limits, require permitting under NRSWA/TMA.	information requested by Norfolk County Council by Deadline 5. 5.4.13 The Applicant notes Norfolk County Councils position on the peak hour. The assessment undertaken in **7.11 Transport Assessment [APP-333]** is reflective of the peak hours captured in the surveys. The monitoring and booking of HGVs will be reflective of this assessment, and the peak hour will be incorporated. 5.4.23 This is noted by the Applicant. The signs will follow the process for Local Highway Authority approval, and the Applicant and Main Works Contractor will liaise with the Local Highway Authority. 5.7.11 The Applicant has provided a response to the proposed traffic volumes through Diss and the mitigation proposed in the Applicant's response to question TT1.14, provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant welcomes the note that LGVs will be able to travel on the A1066. Table 5.9 The Applicant notes the comment on proposals through Diss. The Applicant will continue to liaise with Norfolk County Council, and will update **7.3 Outline Construction Traffic Management Plan [Revision C]** where appropriate. 4. The Applicant notes this comment.
			Thurrock Council The Council will respond with amendments and comments to the Outline CTMP separately and will submit this after deadline 3 with the approval from the ExA.	Noted. The Applicant has not yet received comments on the Outline CTMP from Thurrock Council.
			National Highways NH welcomes the applicant's confirmation within their REP1-132 to include National Highways as a consultee. However, NH requires this is formally changed and that NH is explicitly referenced within the documents and the requirements of the DCO. Reference to the A12 Widening Scheme should be removed as these works are not proceeding at this time. This section should be amended to include recently announced schemes, such as the Wix Bypass Concrete Road Renewal Scheme.	The Applicant notes National Highways' comments on the additional requirements to **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant has updated Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to be reflective of the assumption that LHAs includes National Highways in the response to 4.4.6 in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. The Applicant also confirms its intention is to update **3.1 Draft Development Consent Order [Revision D]** in order to facilitate consultation with National Highways in

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Table 5.9 outlines the proposed Junction Capacity Mitigation Measures. Whilst the modelling that supports these proposals remains unagreed, the level of impact is not fully understood and the required mitigation cannot be agreed.	respect of the future discharge of those aspects of Requirement 4 which relate to the strategic road network. The Applicant has removed reference to the A12 Widening Scheme in paragraph 5.4.10 of **7.3 Outline Construction Traffic Management Plan [Revision C]**. The Wix Bypass Concrete Road Renewal Scheme has been added, however, no additional information is included within **7.11 Transport Assessment [APP-333]**. The Applicant is liaising, and will continue to liaise, with National Highways on the junction modelling and mitigation proposals.
			Suffolk County Council SCC does not propose to respond at this deadline but reserves right to future deadline.	Noted
TT 1.38	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	**Statements of common ground** In the SoCG with **National Highways [REP1-048]** a number of statements suggest that you are awaiting further information following requests to allow you to further consider the applicant submission. Please can you state if this additional information is now available to you and if not, what timescales you require to ensure an adequate response to any outstanding matters or concerns. Please can all local highway authorities address this same question.	**Essex County Council** ECC is waiting for the following information: • Detailed Technical Note including latest traffic data comparisons with model survey data and queue data for validation junction models • TROs to be reviewed when the following information is available: – Existing baseline traffic on diversion routes – Existing baseline traffic on the route that is to be temporarily closed – Proposed construction traffic (volume and traffic makeup) for diversion routes – Speed surveys for mitigation works – Parking demand surveys for parking restrictions – Timescales for each TRO listed in the DCO Schedule – Statement of reasons for each TRO proposal – Parking data to support the parking restrictions – Speed data associated with the mitigation designs • Details of proposed shift patterns for workers • Junction mitigation proposals • Further consideration of Wick Lane proposals as the principle of using Wick Lane temporarily between the two proposed haul road access points is not accepted based on current option provided • Alternative design of Ardleigh Road based on passing bays (permanent) AIL tracking as pdf version to review	The Applicant will provide the information related to traffic data and junction modelling at Deadline 5. TRO information: The Applicant has agreed to provide further clarification on the reasons for and anticipated durations of each of the TROs provided within Schedule 13 of **3.1 Draft Development Consent Order [Revision D]**. This information will be provided by or before Deadline 5. The Applicant would welcome further discussions for reaching agreement on the TRO proposals with ECC following provision of these clarifications. The Applicant has discussed the AIL tracking with ECC and have drawn their attention to the **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans Sections A-B and D-G [APP-312 to APP-319] and Sections C and H [Revision B]** which contain the relevant AIL information.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			Norfolk County Council NCC highways are still waiting for more information from the application regarding Diss Access Strategy.	The Applicant notes this comment and the Diss Access Strategy document will be submitted to NCC at Deadline 5.
			Thurrock Council The Council is in ongoing conversations with the Applicant and whilst some requests for information have been provided, there are still outstanding matters. We will require the requested information by the latest Deadline 4 in order to address outstanding matters.	Noted. The Applicant will be providing an Addendum to **7.11 Transport Assessment [APP-333]** during the examination at Deadline 5 which will provide supplementary modelling assessments. The Applicant will continue to engage on any information that Thurrock Council considers to still be outstanding.
			National Highways NH's view is that there are still a number of outstanding matters where information is required to provide sufficient assurance that that the proposed development will not have an adverse impact on the SRN. A meeting between NH and the applicant has been proposed to progress the Statement of Common Gound but a date has not yet been agreed. When the information is provided, NH can provide a response within 3 weeks. However, should further modelling be required, sufficient time will be needed for the applicant to undertake the modelling process and for NH to validate the work.	Noted. The Applicant will be providing an Addendum to **7.11 Transport Assessment [APP-333]** during the examination at Deadline 5 which will provide supplementary modelling assessments. Trip generation and assignment flows have been provided to National Highways as requested.
			Suffolk County Council SCC has yet to receive the information, however it is expected and the Council intends to respond by Deadline 4 if practicable.	Noted

19. Water environment: flood risk hydrology and drainage

Table 19.1 Water environment: flood risk hydrology and drainage

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
WE 1.5	The applicant	Flooding concerns A number of individual RRs from property owners highlight a concern regarding increased risk of flooding, some citing known issues that could see an increased risk of localised flooding to property. Please explain how you are addressing these individual concerns and provide a schedule of specific location-by-location responses to all RRs and consultation responders who have raised property flooding as a concern, stating the communication statusand how mitigation is secured in the draft DCO.	**Joanne Lesley Elliott & Richard James Guy Davies** We have raised concerns about flooding risk and noise to our listed property given its site on the steep sided valley. We hope we will have the opportunity to see The Applicants response and pose further challenge if an adequate assessment is not provided, given the number of times these concerns have been raised with The Applicant and ignored.	The Applicant has sought to identify and review all RRs that include representations on hydrology, land drainage and flood risk, and where these identify specific properties and / or very localised concerns, site-specific responses have been provided within the table provided in the Applicant's response to this question in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. This includes a response to RR-1751 as raised by Joanne Lesley Elliott, in relation to Fossetts Lane. This confirms that mitigations to prevent surface water runoff from the construction swathe contributing to local surface water flood risk are secured within commitments GG22, W08, W09, W10, W11, W13, W14 within **7.2 Outline Code of Construction Practice [Revision D]**.
WE 1.9	The applicant	Surface water - 4 In its RR [RR-3792] the Water Management Alliance note that any surface water to be discharged into watercourses they are responsible for will need consent. Please confirm how this is secured in the draft DCO and if agreement has been reached on the consenting process.	**Water Management Alliance** With disapplication of relevant sections of LDA 1991 and IDB Byelaws (referred to above in Ex.Q1 DCO 1.A42), the affected IDBs would not be able to consent surface water discharges. However, the Protective Provisions for drainage authorities, when agreed, will secure an appropriate alternative approvals process for the IDBs that will enable IDBs to continue to deliver an effective land drainage function. Agreement has not yet been reached on the Protective Provisions. WMA will continue to engage with the Applicant with a view to agree the Protective Provisions.	The Applicant agrees with the position set out by the Water Management Alliance and will continue to engage to agree the Protective Provisions.
WE 1.13	The applicant Holton St Mary Parish Council	Holton St Mary Parish Council comments In its WR, **Holton St Mary PC [REP1-168]** notes that drainage works are planned from the haul road into a stream on the west of Sandpits Lane, just to the north of Dewlands Farm. Its notes that the area is rich in wildlife habitat and that otters have been recorded in the area and that the stream proposed for the run-off is prime otter habitat. The PC note that it has not seen any documentation of the ecological impacts of this run-off; or the impacts on river health. Provide an ecological impact analysis of the proposal for this area and, if there are no reasonable alternatives, propose forms of mitigation that might be employed, such as water capture and/or filtration.	**Holton St Mary Parish Council** The area proposed for drainage by National Grid (between Listed Buildings: Pintins, Tiffins and Dewlands Farm on Sandpits Lane – running between the B1070 in Holton St Mary and the B1068 running from the A12 to Higham) runs along the south border of a bluebell wood and the run-off will enter the stream marked on National Grid's own map in blue (see photo NG Stream Snip below). The stream runs from the West through what is a designated County Wildlife Site and Area of Particular Importance for Biodiversity (APIB) and congregates where the drainage area ends. As outlined in the Local Nature Recovery Strategy, The County Wildlife Site of Higham Meadow is recognised as	The Applicant acknowledges that Higham Meadow County Wildlife Site (CWS) is a site of county importance to nature conservation that is identified as an area of particular importance to biodiversity in the Local Nature Recovery Strategy. The effect of temporary attenuation drainage entering the watercourse within the CWS was assessed in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The temporary attenuation basins would ensure that silt and other sediment picked up in the surface water runoff during construction is removed and that clean water leaves the Project at greenfield rates before it enters the channel/pipe that would discharge into the watercourse in the CWS. As identified in **6.8 Environmental Statement**

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
		Holton St Mary PC – Please provide evidence regarding the stream on the west of Sandpits Lane, just to the north of Dewlands Farm, and your statement that the area is rich in wildlife habitat and the stream, where the run-off is proposed, is prime otter habitat where otters have been recorded.	having particular importance for biodiversity through local, national or international designations. This is the link to the Local Nature Recovery Strategy - Suffolk map: https://experience.arcgis.com/experience/6bbe2b576bbb4ea4a04f49fb0fa6feba#data_s=id%3AdataSource_5-1997c7799b9-layer67%3A21702&widget_7=active_datasource_id:dataSource_5,center:605342.4443751641%2C236390.88037862128%2C27700,scale:9683.742836355028,level:13.92504576,rotation:2.327619908064877,viewpoint:%7B%22rotation%22%3A2.327619908064877%2C%22scale%22%3A9683.742836355028%2C%22targetGeometry%22%3A%7B%22spatialReference%22%3A%7B%22latestWkid%22%3A27700%2C%22wkid%22%3A27700%7D%2C%22x%22%3A605342.4443751641%2C%22y%22%3A236390.88037862128%7D%7D (enter CO7 6NG) *[snip in document]* Details of the Local Nature Recovery Strategy for Suffolk: https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and elections/consultations/local-nature-recovery-strategy BELOW – 2 x Snips from SBIS *[photo in document]* showing stream and 1 x National Grid map *[photo in document]* showing stream running into drainage destination, which is an area of increasingly wet woodland. Attached a photo *[photo in document]* of the area taken last year in April/May. Note the abundance of bluebells in the wood to the north of the drainage area and the inclination of the land into a ditch where water from the surrounding fields, road and the upstream water source congregate. National Grid's proposed drainage outlet (again, NG Stream photo showing the presence of the stream) will also drain into this area and into the bluebell wood. PHOTOGRAPHS *[photos in document]* See you also: 1. Photos of water-filled ditch/stream at the end of the bluebell wood area taken with back to bluebells looking West down the footpath. 2. Photo of pond, with bullrushes, behind Tiffins (photo taken from footpath looking East showing Tiffins in the background). 3) Photo for context from road looking (West) down into the bluebell wood (taken March 2026 - bluebells not yet flowering) The drainage area and the road (Sandpits Lane) are much higher than the stream/ditch/pond below the bluebell wood, so all drainage water will run down into the existing pond and water-filled ditch/stream. Sandpits Lane is itself	**Chapter 8 - Ecology and Biodiversity [AS-026]** this would protect water quality within the stream and also protect downstream habitats. The channel though the CWS would be very narrow and with micro-siting it will be possible to ensure minimal damage to the woodland trees, shrubs and ground flora that are within the CWS. This commitment to micro-siting within the CWS to reduce impacts, specifically to mature trees, is set out within the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** and secured via Requirement 4 of the DCO. Following the implementation of mitigation there will be no residual significant effects on biodiversity features. There would be no loss to biodiversity, no impacts to features suitable for use by roosting bats and no other negative effects on flora and fauna including nesting birds and otter. In view of its status as a site of county importance, at detailed design the precise route of the temporary drainage channel would be selected to minimise impacts to flora and fauna particularly trees and their roots as set out within **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. With regard to the comments provided about existing flooding on sections of Sandpits Lane, the Project's drainage designs, which would be further refined and detailed post consent using data from site specific topographical surveys and ground investigations, would ensure that there would be no contribution to these existing issues from adding additional water burdens. All runoff from Project work sites would be collected and attenuated back to existing (greenfield) rates prior to discharge (or infiltration where this proves feasible). Commitment GG22 within **7.2 Outline Code of Construction Practice [Revision D]** secures preparation of these more detailed designs, which will be reported in a Surface Water Management Plan developed liaising with the Lead Local Flood Authorities (LLFAs) and statutory undertakers.

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			lower than the field to the East and National Grid's main undergrounding swathe. Run off will be considerable into the drainage area, bluebell wood, stream and pond. Full feasibility survey should be conducted for viability of this location for drainage. National Grid's map showing the proposed run-off/drainage channel in pink and the Stream in blue. *[photo in document]* EVIDENCE PRESENCE OF WILDLIFE Flora & Fauna recorded: Photograph showing bluebell wood area (entitled 'drainage destination'). The wood is completely covered in bluebells. Photo, taken last year, from footpath facing South-East, back up towards the road and border with Dewlands Farm paddock. Bluebells are an Ancient Woodland Indicator Species and are protected under the Wildlife & Countryside Act (1981) Using Suffolk Biodiversity Information Service map and enter: CO7 6NG (suffolkbis.org.uk/record/nbn-atlas-records)(see 2 x Snips below) [photos in document] The drainage area is within the Dedham Vale National Landscape and there are lots of otters present along the Stour and the Dedham Vale area. Work has been going on in the area for the past 20 years to boost the otter population: news.bbc.co.uk/1/hi/england/suffolk/4635242.stm A dead Otter was found in Holton St Mary about four years ago, but I cannot find evidence for this – photos were published at the time. Otters will happily travel up to 10 miles when hunting and will visit the stream & pond shown in photographs and in the wet area of County Wildlife Site of Higham Meadow. I also attach a list of bat species recorded at CO7 6NJ last Autumn. This is a very important area for wildlife. Parish Councillors have also personally recorded (phone video – can be supplied) several nightingales singing along the footpath. FLOODING WE Water environment: flood risk, hydrology and drainage Worth noting is that this section of Sandpits Lane already floods with just moderately heavy rainfall, so additional water burden in this area will have an enormous detrimental cumulative impact on both wildlife and public amenity (making the footpath impassible), not to mention highways (Sandpits Lane will become impassible as it is sometimes already after heavy rainfall). See - Photo of road, taken facing South from the top of the bluebell wood, showing flood evidence	

Reference	Question Addressed to	Question	Response from interested parties or affected person	Applicant's Comment
			(potholes and run off) exactly where NG propose to run the drainage channel. If drainage is to go ahead – serious mitigation will be required to prevent the road flooding, to prevent destruction of the bluebells if wood becomes waterlogged and excessive flooding/pollution of the stream/ditch & pond, and flooding of the footpath. IRREPLACEABLE HABITAT NB – separately, but in the same wildlife area: Irreplaceable tree by Dewlands Farm. *[photo in document]* National Grid should please be required to give wide berth of these tree roots when digging the undergrounding swathe generally and the drainage channel - https://www.woodlandtrust.org.uk/blog/2021/04/root-protection-areas/ Perhaps the swathe could be moved further to the East at that point and drainage channel taken out to the East? Certainly, any run-off/drainage should be subject to filtering and reduced in some way to protect all of this beautiful fragile habitat?	

Appendix A. Applicant's Comments on Responses to GEN 1.21

nationalgrid

Appendix A
Applicant's Comments on Responses to GEN 1.21

Table A.1 Applicant's comments on responses to GEN 1.21

Topic Matter	Local Planning Authority	Mechanism of Agreement	Local Authority comments to GEN 1.21 Response to ExAQ1 Deadline 3 – 10 April 2026	8.9.1 Applicant's Responses to First Written Questions [REP3-074] Appendix E. Supplement 6 - GEN 1.21 Full Answer	Applicant's Latest Position
3:1 Off-Site Tree Planting	Suffolk County Council Norfolk County Council Essex County Council Babergh and Mid-Suffolk District Councils South Norfolk District Council Tendring District Council Colchester City Council Chelmsford City Council Braintree District Council Brentwood District Council Thurrock Council (all authorities)	S106	All authorities raise tree planting as a matter to be secured by a legal agreement. Eight of the authorities (Essex County Council, Babergh and Mid Suffolk District Councils, Tendring District Council, Colchester City Council, Chelmsford City Council, Braintree District Council, Brentwood District Council) state the below: *'Tree Planting* *Replacement / Mitigation/ Compensatory to secure the deliver an 'Off-Site Planting Delivery Scheme' prepared in accordance with the Reinstatement Planting Plan pursuant to Requirement 9 of the Development Consent Order. The Reinstatement Planting Plan to for offsite tree planting to also cover any additional mitigation planting or compensatory planting'* Suffolk County Council state: '*Tree Replacement Planting Programme, to support the delivery of the Applicant's proposed 3:1 replacement ratio for individual trees (as noted in paragraph 2.6.6 of the Applicant's Comments on Local Impact Reports [REP2-030]*)' Norfolk County Council and South Norfolk District Council state simplified requests such as '*Replacement tree planting*' and '*Replacement planting*' respectively. Tendring District Council states '*The Council is currently working on the following documents.... Unilateral Undertaking / S106 agreement for Tree provision*.'	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering 3:1 tree replanting for individual trees and individual trees in small groups. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's 3:1 commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. There are no obligations on the Local Planning Authorities as a result of the agreement which would more readily suit a bilateral agreement. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver on the commitment or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.	The Applicant provided a justification for the use of a Section 106 (s106) unilateral undertaking (UU) in response to the original written question GEN 1.21 as set out in the adjacent column and therefore will not seek to repeat this. Further justification has been provided in relation to the enforcement of the agreement. A s106 UU has the same legal status as a bilateral or multilateral Section 106 agreement. Once accepted and relied on, it is enforceable by the Local Planning Authorities under s106(5) of the Town and Country Planning Act 1990. Because a UU is made solely by the landowner (and 'runs with the land') and there is no need for other parties, the Council's enforcement is not dependent on third party cooperation, which can simplify and strengthen enforcement action. The Applicant notes the comments in relation to the details of tree planting being prepared in accordance with Requirement 9. To clarify, details of the 3:1 tree planting provided on-site will be submitted under Requirement 9 and approved by the relevant Local Planning Authorities. The details of the offsite planting provided under the 3:1 tree planting commitment would be included within an Offsite Planning Delivery Scheme which will be provided to the relevant Local Planning Authorities for their information. The provision of the Offsite Planting Delivery Scheme will be secured by the legal agreement. In terms of the aftercare for the tree planting provided in relation to the commitment, the on-site provision will be subject to a five-year period, and the Applicant would use

Topic Matter	Local Planning Authority	Mechanism of Agreement	Local Authority comments to GEN 1.21 Response to ExAQ1 Deadline 3 – 10 April 2026	8.9.1 Applicant's Responses to First Written Questions [REP3-074] Appendix E. Supplement 6 - GEN 1.21 Full Answer	Applicant's Latest Position
					reasonable endeavours to ensure the off-site planting is also maintained for a five-year period. The Heads of Terms for the s106 UU has been shared with the local authorities.
Planting and monitoring for irreplaceable habitats	South Norfolk District Council	S106	South Norfolk District Council state: '*In APP 323 Document: 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy Table 5.1 provides a list of compensation measures which includes provision for monitoring. Areas of new planting (compensation for impacts on irreplaceable habitat) will need securing via a S106 in perpetuity. Any monitoring reports relating to irreplaceable habitat should be secured via the DCO or the S106.*'		The Applicant has committed within Table 5.1 of **7.4 Outline Landscape and Ecological Management Plan Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-033]** to maintain and monitor compensation measures for veteran trees (which could include planting) for 30 years. The Ancient Woodland and Veteran Tree Strategy will be updated and submitted with the final Landscape and Ecological Management Plan(s) and subject to the approval of, and discharged under Requirement 4 by the relevant Local Planning Authorities. Full details of the monitoring and management regime will be provided at this stage. An additional legal agreement to secure this planting and monitoring of the measures is not considered necessary and would duplicate the effect of Requirement 4.
Biodiversity Net Gain (BNG)	Suffolk County Council Norfolk County Council Essex County Council Babergh and Mid-Suffolk District Councils South Norfolk Tendring District Council Colchester City Council Chelmsford City Council Braintree District Council Brentwood District Council (all authorities but not Thurrock Council)		All authorities raise BNG as a matter to be secured by legal agreement. Seven of the authorities (Essex County Council, Babergh and Mid Suffolk District Councils, Tendring District Council, Colchester City Council, Chelmsford City Council, Brentwood District Council) state the below: *'BNG - to deliver a 10% biodiversity net gain together with appropriate management and monitoring for at least 30 years'* Three of the authorities (Suffolk County Council, Norfolk County Council and South Norfolk District	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% BNG. This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG will be secured through legal agreements (either s106 agreements or conservation covenant agreements) between the appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable). The Applicant shall then acquire biodiversity units from these landowners. The s106 unilateral undertaking intended to be given by the Applicant to the Local	In response to the comments raised in relation to securing appropriate management and monitoring, the Applicant provides the following comments. Off-site Biodiversity Net Gain (BNG) will be secured through the Applicant's acquisition of biodiversity units from established Habitat Banks. These Habitat Banks are themselves engaged in Section 106 agreements or Conservation Covenants with the relevant Local Planning Authority or Responsible Body, requiring habitats to be created and maintained for a minimum of 30 years – and are strictly governed. The Applicant will enter into a commercial contract with the Habitat Banks to acquire the necessary units. The

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			Council) state simplified requests such as 'Biodiversity net gain'. Thurrock District Council does not mention BNG in their response to GEN.1.21.	Planning Authorities will not itself secure the management and maintenance of any off site BNG. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's BNG commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. As BNG is being provided as a voluntary commitment, there is no need to place any obligations on the Local Planning Authorities. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver a 10% BNG or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.	Habitat Banks will manage and maintain any habitats. As the long-term management and maintenance of off-site BNG is already secured through these separate legal mechanisms, there is no need for the Applicant's unilateral undertaking to duplicate those obligations. The s.106 Unilateral Undertaking commits to the Applicant providing an updated BNG Report which will detail the biodiversity units required to be submitted off-site. The Report will include details of how it is proposed to deliver these units, in addition to the wider benefits to be secured. The agreement will also commit the Applicant to providing a report to confirm that the biodiversity units have been delivered. Detailed designs for the on-site habitats will be finalised and submitted as part of the final Landscape and Ecological Management Plan(s), at which stage the habitat being relied upon for BNG will be clearly defined. The Applicant has committed within **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** to manage the Environmental Areas for 30 years. Any reinstatement planting outside the Environmental Areas will be subject to a five-year aftercare period. The Heads of Terms for the s106 Unilateral Undertaking have been shared with the local authorities.
Biodiversity Net Gain	Suffolk County Council Norfolk County Council Essex County Council Babergh and Mid-Suffolk District Councils South Norfolk Tendring District Council		All authorities raise BNG as a matter to be secured by legal agreement. Seven of the authorities (Essex County Council, Babergh and Mid Suffolk District Councils, Tendring District Council, Colchester City Council, Chelmsford City Council, Brentwood District Council) state the below:	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% BNG. This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG will be secured through legal agreements (either s106 agreements or conservation covenant agreements) between the	In response to the comments raised in relation to securing appropriate management and monitoring, the Applicant provides the following comments. Off-site BNG will be secured through the Applicant's acquisition of biodiversity units from established Habitat Banks.

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	Colchester City Council Chelmsford City Council Braintree District Council Brentwood District Council (all authorities but not Thurrock Council)		*'BNG - to deliver a 10% biodiversity net gain together with appropriate management and monitoring for at least 30 years'* Three of the authorities (Suffolk County Council, Norfolk County Council and South Norfolk District Council) state simplified requests such as 'Biodiversity net gain'. Thurrock District Council does not mention BNG in their response to GEN.1.21.	appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable). The Applicant shall then acquire biodiversity units from these landowners. The s106 unilateral undertaking intended to be given by the Applicant to the Local Planning Authorities will not itself secure the management and maintenance of any off site BNG. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's BNG commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. As BNG is being provided as a voluntary commitment, there is no need to place any obligations on the Local Planning Authorities. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver a 10% BNG or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.	These Habitat Banks are themselves engaged in Section 106 agreements or Conservation Covenants with the relevant Local Planning Authority or Responsible Body, requiring habitats to be created and maintained for a minimum of 30 years – and are strictly governed. The Applicant will enter into a commercial contract with the Habitat Banks to acquire the necessary units. The Habitat Banks will manage and maintain any habitats. As the long-term management and maintenance of off-site BNG is already secured through these separate legal mechanisms, there is no need for the Applicant's unilateral undertaking to duplicate those obligations. The s.106 Unilateral Undertaking commits to the Applicant providing an updated BNG Report which will detail the biodiversity units required to be submitted offsite. The Report will include details of how it is proposed to deliver these units, in addition to the wider benefits to be secured. The agreement will also commit the Applicant to providing a report to confirm that the biodiversity units have been delivered. Detailed designs for the onsite habitats will be finalised and submitted as part of the final LEMP(s), at this stage the habitat being relied upon for BNG will be clearly defined. The Applicant has committed within the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** to manage the Environmental Areas for 30 years. Any reinstatement planting outside the Environmental Areas will be subject to a five-year aftercare period. The Heads of Terms for the s106 UU has been shared with the local authorities.

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Skills and Employment Plan Including; Workforce Skills Training Support for existing projects and programmes	Essex County Council Babergh and Mid-Suffolk District Councils Tendring District Council Colchester City Council Chelmsford City Council Braintree District Council Brentwood District Council	S106 S111	Within the Authorities response to GEN.1.21, seven authorities (Essex County Council, Babergh and Mid Suffolk District Councils, Tendring District Council, Colchester City Council, Chelmsford City Council, Brentwood District Council), state: '*Skills Supply Chain Employment and Training - to secure an Employment, Education, Skills and Supply Chain strategy for the project together with appropriate funding through a Section 106 agreement*'	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. No legal agreement through a s106 is required. Page 5 No legal agreement through s111 is required. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is Required Supporting existing projects/programmes relating to employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is Required The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. No legal agreement through s106 required. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. Supporting employment, education and skills development will also be considered	It is proposed that an Employment and Skills Plan (ESP) will be supplied at Deadline 5 and secured by way of a DCO requirement in the same way as other schemes and plans are being secured. Since the ESP is capable of being secured in this way, the Applicant does not consider it necessary for a section 106 obligation to be entered into to secure the ESP.

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				separately outside the development consent process through community benefits. Coordinator role Members of the community, local businesses and local stakeholders will be kept informed regularly of the works through active community liaison see commitment GG30 in the 7.2 Outline Code of Construction Practice [REP2-014] to be secured via DCO Requirement 4. As such, the Applicant does not consider a planning obligation to fund a Local Business Coordinator is fairly or reasonably related in scale and kind to the development. Any planning obligation must be in accordance with the legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010.	
Highways	Suffolk County Council Essex County Council Babergh and Mid-Suffolk District Councils Tendring District Council Colchester City Council Chelmsford City Council Braintree District Council Brentwood District Council Thurrock Council	A section 278 agreement under the Highways Act 1980	Within the Authority's response to GEN.1.21, seven (Essex County Council, Babergh and Mid Suffolk District Councils, Tendring District Council, Colchester City Council, Chelmsford City Council and Brentwood District Council) authorities' state: *'Highways - to require the Applicant to enter into a Framework Highways Agreement, to require the Applicant to enter into a Developers Forum as a vehicle to coordinate construction activity associated with multiple development projects with the aim of minimising cumulative impacts. to secure a financial contribution towards offsetting the additional "wear and tear" associated with the construction works'* Suffolk County Council states: '*Additionally, the Local Highway Authority is engaged with the Applicant to negotiate a Framework Highways Agreement*' Thurrock Council states: '*The Council is currently working on the following draft documents .... Draft Highways Framework Agreement and Draft Highways Protective Provisions*'.	The Applicant has begun discussions with the host local highway authorities and National Highways on the recovery of appropriate costs through a PPA. It is the Applicant's understanding that the highway authorities are seeking a joint highways framework agreement (a section 278 agreement under the Highways Act 1980) in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination. Paragraph 13 of Part 4 of Schedule 16 to 3.1 Draft Development Consent Order [Revision C] outlines the Applicant's approach to extraordinary traffic with regards to condition surveys and reimbursement of expenses. This specifies that the repair of any damage that is directly attributable to the	The Framework Highway Agreement can be secured by Section S278 Agreement (Section 278 of the Highways Act 1980), rather than through a Section 106 agreement, because it relates to the delivery and governance of works within the public highway, rather than the mitigation of a planning impact. There is no need for a s106 (Town and Country Planning Act 1990).

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			Braintree District Council has confirmed they have commenced '*discussions with the Applicant regarding the nature and level of mitigation to be delivered through a s106 legal agreement to cover the following... Highways*'.	Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense. Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any extraordinary expense, the relevant highway authority may have recourse to Section 59 of the Highways Act 1980 in the usual way. In relation to road condition surveys, 7.3 Outline Construction Traffic Management Plan [Revision B] to be secured via DCO Requirement 4, sets out that the Applicant proposes to undertake pre- and post-construction condition surveys of the existing highway network on AIL and Heavy Goods Vehicle (HGV) routes. The Applicant is committing to employing best practicable means (BPM) to reduce the effects of construction noise and vibration. Specific mitigation measures will be determined following detailed construction and noise and vibration assessments by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014] be secured via DCO Requirement 4. Mitigation in the form of BPM will be identified and employed to avoid potential significant adverse effects and reduce potential adverse effects as per the range of commitments in 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306] to be secured via DCO Requirement 4.	

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Highways	Suffolk County Council	S106	Suffolk County Council states: '*Abnormal Indivisible Load ("AIL")* *funding to support the operational capacity of the relevant police forces for these AIL movements'* This is not mentioned by any other authority.	The Applicant has held regular meetings with Essex Police and Suffolk Constabulary (the Joint Forces) and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for Abnormal Indivisible Load (AIL) escorts.	Following Issue Specific Hearing 2 on 01 May 2026, the Applicant will continue to work with the Joint Forces to establish an appropriate and proportionate mechanism for funding AIL police escorts. Actions captured at Issue Specific Hearing 2 on 01/05/2026: '***Abnormal Indivisible Loads (AIL)*** *The Suffolk Constabulary and Essex Police (the Joint Forces) to provide a copy of National Police Chiefs' Council Guidelines on charging for police services.* ***Abnormal Indivisible Loads*** *Provide updated SoCG with the Joint Forces to include updates on discussions regarding outstanding concerns on certainty and funding mechanisms.* ***Abnormal Indivisible Loads**:* *cumulative impacts Applicant and local highway authorities to provide in writing an update on cumulative impacts of AIL routing and progress with route assessments, including structural assessment.*'
Furthering the purposes	Suffolk County Council	S106	Suffolk County Council states *'National Landscape Duty (as outlined in section 85 of the Levelling-up and Regeneration Act 2023) funding to support the delivery of programme activities as detailed in the Dedham Vale National Landscape and Stour Valley Management Plan 2026-2031, including a feasibility study for the removal of the UK Power Networks 132kV PJ Line v.'*		The Applicant has updated the Heads of Terms for the s106 agreement to secure the additional measures proposed to meet the s85 duty of the Countryside and Rights of Way Act 2000 which are 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]**. The Heads of Terms have been updated to address comments received from the Dedham Vale National Landscape Partnership and also Suffolk County Council. It is hoped these Heads of Terms will be agreed shortly.
Health and wellbeing (public rights of way (PRoW))	Essex County Council Babergh and Mid-Suffolk District Councils Tendring District Council Colchester City Council		Within the Authorities' response to GEN.1.21, seven authorities' state '*Wellbeing & PROW - To secure a contribution towards improving the use of the PROW network'*	The Applicant responded, on pages 744 - 745 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], to Tendering District Council's request for a safe movement package including	The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding these matters.

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	Chelmsford City Council Braintree District Council Brentwood District Council			mapped, fully segregated NMU routes; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes; and micro-grants. The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding these matters. The Applicant considers micro-grants for community route guardianship, wayfinding and rural wellbeing walks during construction could be considered through community benefits. Community benefits are separate from and not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order. We are currently developing our approach to community benefits, and in spring 2026 we plan to begin consulting on how the community benefit funds should be used. The Applicant considers that the request for PRoW promotion falls outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance[27]	The proposed obligation to secure a contribution towards improving use of the Public Right of Way (PRoW) network does not meet the Regulation 122[28] tests for a Section 106 agreement. The contribution is not necessary to make the development acceptable in planning terms, as no specific or evidenced impact on the local PRoW network has been identified arising from the proposal. It is also not directly related to the development, as it seeks a general improvement to the wider PRoW network to improve use of the PRoW network rather than a contribution resulting in mitigation of a site-specific impact. The Applicant maintains that these requests can be sought and considered through community benefits provision should the authorities wish, at a point when the community benefit fund is available.
Heritage mitigation and compensation	Chelmsford City Council	S106	Chelmsford City Council stated: '*CCC retains its previous comments set out in the LIR REP1-153 relating to the need for heritage mitigation and compensation and would welcome discussions*'.	None of the policies on heritage in EN-1 and EN-5 expressly mention compensation. Furthermore, the National Planning Policy Framework (2025) does not make reference to a requirement for compensation for any harm to heritage assets. The provision of heritage	The Applicant has no further comments to make and refers back to the response provided to this matter in written question GEN 1.21 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** which has been provided in the adjacent column.

[27] Department for Energy Security and Net Zero (2025) Community Funds for Transmission Infrastructure: Guidance

[28] Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010

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				compensation as described would not reduce or remove harm and therefore does not materially inform the planning balance. The provision of a general package which is not tied to a specific heritage asset would fail to meet the legal tests under regulation 122 of the Community Infrastructure Levy Regulations 2010 on demonstrating that it is directly related to the project. It is considered that the provision of heritage compensation repairs would fail to meet the tests for a section 106 Agreement.	

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