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Norwich to Tilbury

Volume 5: Reports and Statements

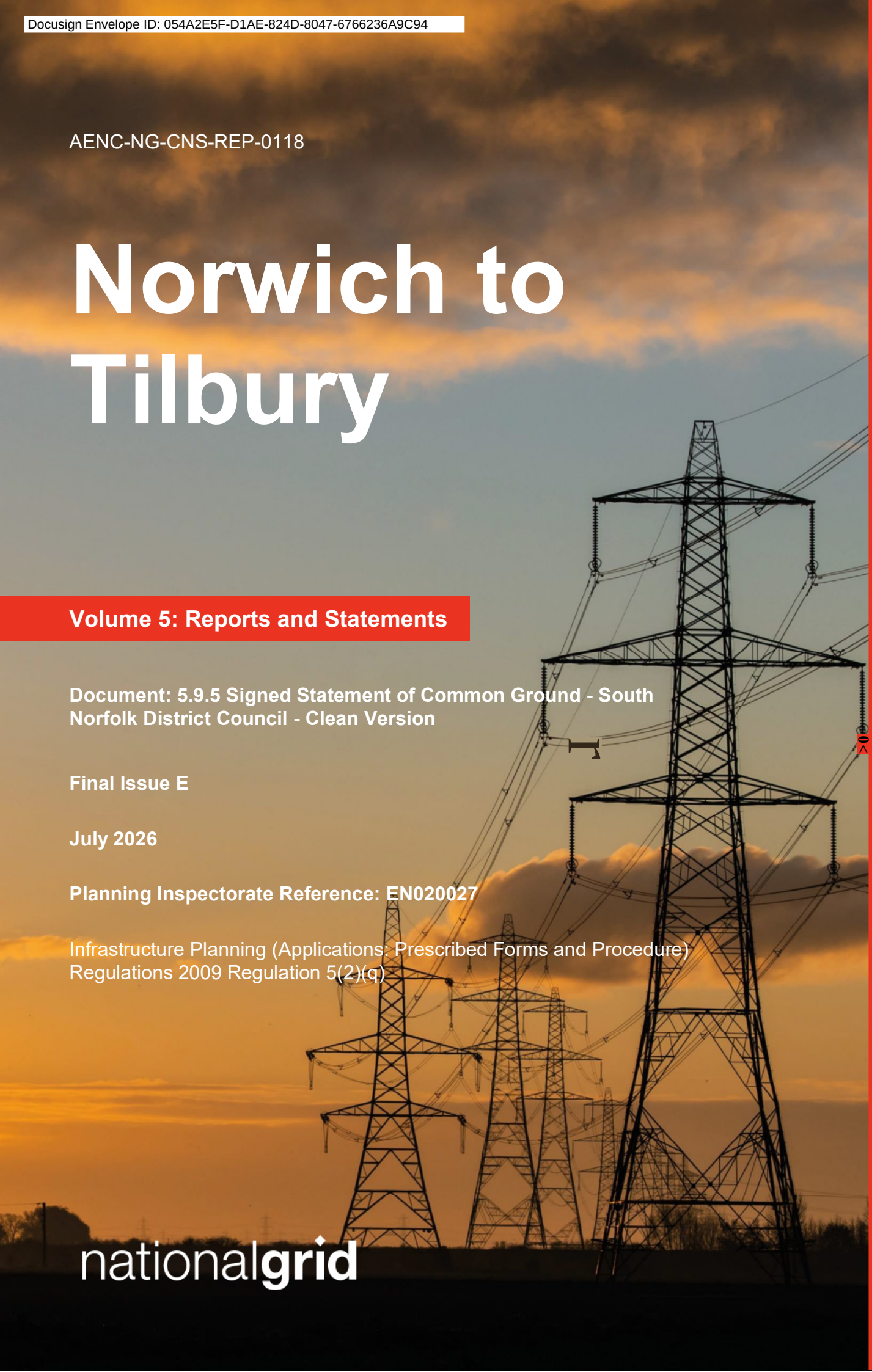
Document: 5.9.5 Signed Statement of Common Ground - South Norfolk District Council - Clean Version

Final Issue E

July 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)



nationalgrid

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Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
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E	21 July 2026	Deadline 7

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1. Introduction

1.1 Overview

1.1.1 This final Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as the Applicant within this document) and South Norfolk District Council (SNDC). It identifies areas of the Norwich to Tilbury project (the 'Project') within the Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to SNDC. The applicable matters considered within this SoCG apply to SNDC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):

- Project development, description and design
- Ecology and Biodiversity
- Air Quality
- Noise and Vibration
- Health and Wellbeing
- Historic Environment
- Landscape and Visual
- Socioeconomics, Recreation and Tourism
- Cumulative Effects
- Development Consent Order Other Matters

1.2 Summary of Matters Under Discussion

1.2.1 As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

SoCG ID	Summary of matter under discussion	Deadline for resolution
Project Development, Description and Design		
3.2.11 - Compensation/ Offsetting	National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy	Discussions will conclude after finalisation of this SoCG through the draft DCO wording.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	and therefore do not meet the relevant policy and legal tests.	
Noise and Vibration		
3.5.9 - Operational (and maintenance) Effects	SNDC consider that the operational noise assessment can not be truly quantified until the final design has been fixed. The Applicant notes that adverse effects from operational noise are not expected, even directly underneath the line. This is therefore the case irrespective of any movement within the Limits of Deviation (LoD).	Discussions will conclude after finalisation of this SoCG

1.3 Project Description

1.3.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
  - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1)
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

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1.3.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.3.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.3.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with SNDC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

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2. Record of Key Engagement

2.1 Introduction

2.1.1 The Applicant has engaged with SNDC on the Project throughout the pre-application process. This has included:

- Non-statutory consultation in Spring 2022 and Summer 2023
- Statutory consultation in Spring 2024
- Targeted Consultations in Spring 2025
- Regular meetings with lead officers about the Project as a whole
- Regular 'Thematic Group' meetings bringing together host authorities to discuss specific topics
- One to one / small group technical meetings on specific detailed matters
- Sharing of papers and draft documentation at key stages

2.1.2 Further details on the Applicant's engagement with stakeholders is provided in **5.1 Consultation Report – Appendix A: Meetings and correspondence with stakeholders [APP-067]** and throughout the Environmental Statement.

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between the Applicant and SNDC.

Table 2.1 Summary of key engagement between the Applicant and SNDC

Date	Format	Topic/Description
General		
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.

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Date	Format	Topic/Description
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
October 2023 - Ongoing	Meeting	SNDC monthly informal catch-up meetings and ad hoc as required.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	The Applicant issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	The Applicant issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	The Applicant issued the Works In, Over and Under Watercourses technical note.
September 2024	Email Correspondence	The Applicant issued the **draft Outline Code of Construction Practice (Outline CoCP) [REP4-164]** and draft Outline Landscape and Ecological Management Plan (Outline LEMP) to all host authorities for comment.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	The Applicant shared the 2nd iterations of the Outline LEMP and Outline CoCP.
January 2025	Meeting	The Applicant held a meeting to discuss comments from stakeholders on the 2nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop

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Date	Format	Topic/Description
April 2025	Email Correspondence	The Applicant shared the draft Statement of Common Ground for comment.
May 2025	Email Correspondence	The Applicant shared the updated draft OCoCP and OLEMP for comment.
May 2025	Email Correspondence	The Applicant issued Appendix D to the OLEMP - Outline Landscape Proposals
May 2025	Email Correspondence	The Applicant issued Appendix H to the OCoCP – Draft Greenhouse Gas Reduction Strategy.
November 2025	Meeting	All host authority workshop
January 2026	Meeting	Meeting to progress Statement of Common Ground
January 2026	Meeting	Meeting to discuss approach to DCO requirements
January 2026	Meeting	All host authority workshop
March 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
July 2026	Meeting	Meeting held with host authorities to discuss mechanism to secure BNG and offsite tree planting and detailed wording
Ecology and Biodiversity		
August 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for Biodiversity Net Gain (BNG).
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Outline Landscape and Ecological Management Plan (OLEMP)

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Date	Format	Topic/Description
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Email Correspondence	The Applicant issued the Protected Species Proposed Mitigation Measures to stakeholders including SNDC.
January 2025	Meeting	The Applicant held a meeting to discuss comments on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant issued the BNG Strategy to stakeholders including SNDC.
January 2025	Meeting	The Applicant held a meeting to discuss comments on the BNG report.
January 2025	Email Correspondence	The Applicant shared the 2nd iteration of the Outline LEMP
April 2025	Email Correspondence	The Applicant issued the draft Arboricultural Impact Assessment.
April 2025	Meeting	The Applicant hosted a meeting to discuss comments on the 2nd iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	The Applicant hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
March 2026	Meeting	The Applicant hosted a meeting to discuss the matters under discussion for ecology within the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground.
Air Quality		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Air Quality assessment for review and comment.
June 2026	Meeting	The Applicant arranged a meeting to discuss the Statement of Common Ground.
Noise and Vibration		
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.

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Date	Format	Topic/Description
Health and Wellbeing		
September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment, including guidance, study area, scope, and assessment methodology.
September 2024	Meeting	The Applicant held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	The Applicant issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
Historic Environment		
July 2022	Email Correspondence	The Applicant issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	The Applicant presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints

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Date	Format	Topic/Description
		with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	The Applicant shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
June 2024	Meeting	Archaeology Working Group Meeting
July 2024	Meeting	Archaeology Working Group Meeting
August 2024	Meeting	Archaeology Working Group Meeting
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting – aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
November 2024	Meeting	Archaeology Working Group Meeting
December 2024	Meeting	Archaeology Working Group Meeting
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Technical Note	The Applicant shared the Historic Environment Viewpoint documents and shapefiles
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Viewpoint Meeting to discuss proposed viewpoints
February 2025	Technical Note	The Applicant shared the draft Historic Environment Baseline Report
February 2025	Meeting	The Applicant held a meeting to discuss the Heritage Baseline Report.
March 2025	Meeting	Archaeology Working Group Meeting
March 2025	Email Correspondence	The Applicant issued updated the Historic Environment Viewpoints information to stakeholders including SNDC.

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Date	Format	Topic/Description
April 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	The Applicant shared the Archaeological Fieldwork Summary.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	The Applicant shared Priority Geophys Prelim Grayscales with stakeholders for consideration
September 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	An optional thematic group meeting to discuss feedback on the Historic Environment section of the ES.
October 2025	Meeting	Archaeology Working Group Meeting
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	The Applicant shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Technical Note	The Applicant shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Meeting to discuss the Historic Environment Section of the Statement of Common Ground.
January 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Email Correspondence	The Applicant shared the Supplementary Environmental Information submitted to Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
March 2026	Meeting	Archaeology Working Group Meeting
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.

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Date	Format	Topic/Description
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground.
June 2026	Meeting	Archaeology Working Group Meeting.
July 2026	Meeting	Archaeology Working Group Meeting.
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	Thematic Group meeting – proposed viewpoint locations - Norfolk
April 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023	Meeting	EIA viewpoints meeting - Norfolk
May 2023 – March 2024	Email Correspondence	The Applicant shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	The Applicant responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.

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Date	Format	Topic/Description
September 2024	Email Correspondence	The Applicant shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	The Applicant held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	The Applicant shared the shapefiles for the landscape viewpoints and order limits with SNDC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Norfolk.
October 2024	Meeting	Focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	The Applicant shared updated viewpoint information data following from the landscape thematic workshops
December 2024	Meeting	Methodology and VP discussion with Norfolk County Council and South Norfolk District Council.
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in SNDC's Local Impact Report.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics,

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Date	Format	Topic/Description
		Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate.
June 2023	Technical Note	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	The Applicant held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Technical Note	The Applicant issued the 3rd Socio-economics Recreation and Tourism Technical note on the ES Chapter.
September 2025	Meeting	An optional thematic group meeting to discuss feedback on the Socio-economics, Recreation and Tourism section of the ES.
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.

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3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

3.1.1 This chapter details the matters relevant to SNDC which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.

3.1.2 The red, amber, green status shows the level of agreement with SNDC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.
Not Applicable	Indicates where an issue is not relevant to the stakeholder and therefore does not require further discussion or agreement.

3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process, including through detailed design.

3.1.4 Table 3.2 to Table 3.10 provide the matters agreed, not agreed, under discussion or not applicable in relation to the various topics.

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3.2 Project Development, Description and Design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report. For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].**	SNDC Response to Statutory Consultation (26/07/2024): South Norfolk District Council recognises the need for increased capacity to the existing electricity transmission networks across the Eastern Region in order to cope with the additional new energy generation from offshore windfarms, nuclear power and interconnection with other countries and particularly the significant amount of energy generation above current capacity connecting into Norwich Main and Necton. The Council equally understands that the project would assist in meeting the UK's energy ambition to achieve net zero carbon emissions by 2050 and the Governments Clean Energy target of 2030	Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case - when offshore wind farms are contracted to connect to the UK network - the first of which are contracted to connect in 2030. The Applicant is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.	SNDC Response to Statutory Consultation (26/07/2024): Following the Independent Review commissioned by Norfolk, Suffolk and Essex County Council's which suggested that the delivery is not needed until 2035, we also have concerns regarding the timing of the proposal.	Not Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' **in 8.8.2 Applicant's comments on Local Impact Reports [REP2-030],** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC acknowledges the govts Clean Power 2030 Action Plan and its mission (Dec 2024) setting out its plan for infrastructure pathways and capacity ranges, setting out the emphasis for Norwich to Tilbury to enable energy to be transmitted throughout the UK.	
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury. **7.17 Strategic Options and Backcheck Review documents [APP-355 and APP-357]** published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives. For the Applicant's position on the onshore route, please refer to Section **3.3 'Alternatives - Offshore Alternatives'** in **8.8.2 Applicant's comments on Local Impact Reports [REP2-030].**	SNDC Response to Statutory Consultation (26/07/2024): SNDC consider that a coordinated, Offshore approach would be our preferred solution, to minimise onshore infrastructure. If this is proven to be undeliverable then the Council considers that support should be given to the Undergrounding the whole route.	Not Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. Updated **7.17 Strategic Options and Backcheck Review documents [APP-355 and APP-357]** published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills. For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice - Overhead Line and Underground Cables' in **8.8.2 Applicant's comments on Local Impact Reports [REP2-030]**	SNDC Response to Statutory Consultation (26 July/ 2024): SNDC consider that a coordinated, Offshore approach would be our preferred solution, to minimise onshore infrastructure. If this is proven to be undeliverable then the Council considers that support should be given to the Undergrounding the whole route.	Not Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Project development process - Design				
3.2.5	Waveney Valley	At the statutory consultation in 2024, the Applicant presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation techniques for underground cables in response to GI surveys and the Waveney and Little Ouse Recovery (WaLOR) project. For the Applicant's position on the Waveney Valley, please refer to Section 3.5 'Alternatives - Waveney Valley' in **8.8.2 Applicant's comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC Response to Targeted Consultations (03 March2025): South Norfolk District Council wishes to express its significant disappointment at National Grid's decision to not pursue the undergrounding. South Norfolk District Council is of the view that there is a need to mitigate and offset the impacts of the scheme through the Waveney Valley, given that it meets, in principle, the criteria of NPS EN5 para 2.11.6. We considered that a scheme of landscape enhancement, should be used to offset (at least partially) the residual adverse impacts of the overhead lines that are now confirmed as being proposed for the Waveney Valley.	Not Agreed
Project development process - Consultation				
3.2.6	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 - 16 June 2022. Details of this consultation are outlined in the Consultation	SNDC agree the consultations were undertaken.	Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		strategy, and responses to feedback received during consultation are included in **5.1 Consultation Report- Appendix B: 2022 Non-Statutory Consultation [APP-068].** The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.		
3.2.7	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 - 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the **5.1 Consultation Report- Appendix C: 2023 Non-Statutory Consultation [APP-069].** The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	SNDC agree the consultations were undertaken.	Agreed
3.2.8	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in **5.1 Consultation Report - Appendix E: Statement of Community Consultation and Supporting Evidence [APP-072].** Responses to feedback received during statutory consultation are contained within **5.1 Consultation Report [Revision B].** The statutory consultation was undertaken in accordance with the published SoCC.	SNDC agree the consultations were undertaken.	Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.2.9	2025 targeted consultation	Targeted consultations for Norfolk took place from 30 January 2025 - 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within **5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-077].** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).	SNDC agree the consultations were undertaken.	Agreed
Other matters as required				
3.2.10	Legal agreements	National Grid will secure measures to support the discharge of the statutory duty under section 245 of the Levelling-up and Regeneration Act 2023 (the 'furthering the purposes' duty) through a bilateral obligation with Suffolk CC under section 106 TCPA 1990. An updated unsigned agreement was submitted at Deadline 6 in **8.25 National Landscape - DRAFT - Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [REP6-126]** and the intention is to submit a signed version at Deadline 7	SNDC note that the mechanisms for BNG and replacement planting were to be secured through a legal agreement that we would be party to are now to be secured through Requirements and SNDC agree with this approach.	Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting resulting from the commitment to replace individual trees and individual trees in small groups at a ratio of 3:1, by requirement and not by a unilateral s106 agreement. The Applicant is committed to continue discussions with SNDC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.2.11	Compensation / offsetting	As explained by Counsel for National Grid at ISH4, National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in **8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118],** should the Secretary of State consider the measures necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with NCC and SCC (on behalf of other host authorities) in relation to the Waveney Valley, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		Under discussion

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3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B],** All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed
EIA - Approach and Methods				
3.3.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B],** Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	SNDC agree that habitat survey coverage is sufficient to draw preliminary conclusions.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.3.4	Assessment methodology	The assessment methodology was agreed through **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	The survey methodology was agreed through a Technical Note issued in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.	The survey methodology was agreed through a Technical Note issued in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B].** The key parameters and assumptions presented are considered appropriate.	SNDC consider that the parameters used are appropriate.	Agreed
EIA - Baseline Conditions				
3.3.7	Baseline conditions and receptors - General	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B].**	SNDC advised that this matter can be considered Agreed in a call held on 17 June 2026.	Agreed
3.3.7a	Baseline conditions and receptors - Meadow Wood Nature Reserve County Wildlife site	Meadow Wood Nature Reserve County Wildlife Site (CWS) is included within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** and assessed under the future baseline section just under a different name, given it was not designated at the time of submission of the	Meadow Wood Nature Reserve CWS is likely to be ancient woodland pasture and therefore irreplaceable habitat. Not all woodlands appear on the Ancient Woodland Inventory.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Application. The woodland within the CWS is not included on the Natural England Ancient Woodland Inventory, but impacts to its woodland habitat have been assessed within the assessment as broad-leaved woodland with some veteran trees. Meadow Wood Nature Reserve CWS has also been added to **7.4 Outline Landscape and Ecological Management Plan [Revision G].** with appropriate mitigation measures outlined to ensure no significant residual effects. Mitigation proposals for the CWS would relate to the impact on woodland habitat and this is clearly set out within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** Additional mitigation measures around only pollarding single stemmed trees within the CWS were added to the update of **7.4 Outline Landscape and Ecological Management Plan [REP6-084]** issued at Deadline 6 following discussions with Norfolk Wildlife Trust.	Table 5.4 of the OLEMP has been amended, at Deadline 6, to include pollarding and coppicing, as agreed with Norfolk Wildlife Trust. The conclusion of the impact assessment of 'no significant residual effects; is consistent with the assessments in Table 8.23 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B **[REP-026].**	
3.3.7b	Baseline conditions and receptors - White-clawed Crayfish	Records of white-clawed crayfish within the wider River Tas catchment are acknowledged by the Applicant and following discussions with the Environment Agency specific white-clawed mitigation measures have been included within **7.4 Outline Landscape and Ecological Management Plan [Revision GJ.**	White Clawed Crayfish are present in the River Tas and need to be considered. The OLEMP has been amended to include white clawed crayfish.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Embedded, Standard and Additional Mitigation Measures				
3.3.8a	Embedded mitigation - General	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The replacement planting and habitat creation in the Environmental Areas are considered to be Embedded Mitigation measures and part of the BNG assessment. Offsite BNG is considered enhancement.	Matter agreed by SNDC in June 2026.	Agreed
3.3.8b	Embedded mitigation - Meadow Wood Nature Reserve	The Applicant through routeing has sought to avoid/minimise impacts to Meadow Wood CWS. Impacts to the CWS because of electrical clearance are identified in Table 5.4 in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** with mitigation measures to protect Meadow Wood CWS specified. The Application was submitted in August 2025, eight months prior to the designation of Meadow Wood Nature Reserve County Wildlife Site (CWS). However, weight was given to the area as a candidate CWS with veteran trees during the routeing and siting with the Project designed to minimise impact on the CWS and other CWS's in the area. This includes routeing	Embedded mitigation relevant to ecology is summarised in 8.6.4 of the Chapter 8 which should be read in association with Table 4.2 of **Chapter 4 [APP-130],** which includes sensitive routing. The citation for Meadow Wood Nature Reserve CWS indicates it is likely to be ancient wood pasture, which is irreplaceable habitat and should be acknowledged as such. The current alignment was proposed in February 2025 as part of statutory consultation on Norfolk 3, which considered two route options - one which over-sailed Bunwell Hill CWS (which was already designated), and the other which over-sailed what would become Meadow Wood Nature Reserve CWS. The latter	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		of the haul road and undergrounding of third-party assets outside of the CWS boundary and routeing of the 400 kV overhead line over only the southern corner which is predominantly grassland habitat. The veteran trees are irreplaceable habitat as identified by the UK Government, this area is not identified as an ancient woodland site on the ancient woodland inventory.	as subsequently designated in March 2026. In collaboration with Norfolk Wildlife Trust they have amended the proposal to include coppicing and pollarding. It is acknowledged the haul road and undergrounding of the existing OHL will be undertaken outside the CWS. It is however considered likely that this land is also ancient meadow pasture, which is irreplaceable habitat.	
3.3.9	Standard mitigation - general	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** and set out in the **7.2 Outline Code of Construction Practice [Revision G],** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. **7.4 Outline Landscape and Ecological Management Plan [Revision G]** identifies the measures to safeguard biodiversity. For reptiles this includes restricting timings for vegetation clearance to avoid mortality to reptiles, avoiding the period November to March. For amphibians it identifies the measures required to protect them from killing and injury. **7.4 Outline Landscape and Ecological Management Plan [REP6-084]** was updated at Deadline 6 to make this wording more explicit for timing restrictions	Can NG confirm that no habitats identified as suitable for reptiles will be removed between November and March, and whether, in line with best practice, RAMS will be put in place to avoid killing or injuring amphibians including GCN (e.g. if ponds require draining down). It is noted that Natural England have agreed that standard mitigation is appropriate. **(Statement of Common Ground [REP5-081],** Section 6.1.52 of the OLEMP has amended to make timings for displacement explicit. RAMS for amphibians are included in 6.1.56- 6.1.16. This matter can be agreed.	Agreed

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		around moving reptile hibernation habitat.		
3.3.9a	Standard mitigation - bat boxes	**7.4 Outline Landscape and Ecological Management Plan [REP6-084]** was updated to include the provision of bat boxes/veteranisation equating to 10% of those potential bat roosting features to be removed by the project as agreed with other local planning authorities. These updates were provided in the updated Outline LEMP at Deadline 6. The wording in **7.4 Outline Landscape and Ecological Management Plan [REP6-084]** has been amended to reflect the hierarchical approach that has been taken. Compensation of 10% of trees lost is considered suitable for short- medium term compensation of loss of roost resource. The Project is committed to +10% BNG (despite not being a requirement for NSIP projects). Therefore there would be, as a minimum, no net loss of broad woodland habitat type and individual trees replaced at a ratio of 3:1 (detailed within the Outline LEMP), as such it is considered that there would likely be no net loss in available roost resource in the medium- long term. Roost features being recycled on other trees is not a feasible option, as safety to landowners/ public from the recycled features cannot be guaranteed in the long-term. Suitable examples for bat boxes are given in the **7.4 Outline Landscape and Ecological Management Plan [REP6-084];** however, the	It is requested, in line with Bat Mitigation guidelines, that it be amended to follow a hierarchical approach and provide different % and types of bat box depending on the PRFs lost. Tree roosting bats tend to move roost frequently so the entirety of the tree resource available for bats needs to be considered. Compensation of 10% of trees lost is considered too low (i.e. 10 single bat boxes for every 100 trees lost (trees often contain multiple bat roost features). The LEMP needs to be clear that consideration will be given to the veteranisation of trees in the first instance, with evidence provided if this is not possible. The following hierarchy is suggested for consideration: For PRF-I where the PRF is only suitable for individual bats or very small numbers)- provision of at least 30%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree • Consider if tree can be partially retained, if yes, then veteranize the tree with 2 -3 features • Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes: - Schwegler 2F bat box, and/or - Schwegler 1FF bat box, and/or	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Outline LEMP wording avoids being too prescriptive as the context of the wider retained roost resource should be taken into consideration by the ECoW and professional judgement should be applied as to the type of compensation and location that is most appropriate. The Outline LEMP details in Table 3.1 that the ECoW will be suitably qualified for the task and includes those who hold species specific licences required to supervise works affecting legally protected species, where applicable. It should be noted that this relates to potential roost features and not confirmed bat roosts, mitigation for those would be in accordance with licensing. As a matter of principle trees are to be retained where possible irrespective of their value to bats and features suitable for use by bats are to be retained where pruning is necessary for access these measures are included in **7.4 Outline Landscape and Ecological Management Plan [REP6-084].**	- Schwegler 1FD bat box. For PRF-M, where the PRF is suitable for multiple bats and may be used by a maternity colony, provision of at least 20%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree • Consider if tree can be partially retained, if yes, then veteranize the tree with 4 -6 features • Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes: - Schwegler 1FF bat box, or - Schwegler 1FS or 1 FW Colony Bat Box, and/or - Miramare Woodstone Bat box, and/or - Schwegler 3FF bat box A plan showing the location of the compensatory roosts needs providing to the LPA. Bat boxes need to be installed by a licensed bat worker as EcOW are not necessarily suitably qualified or experienced to advise on the location. As no amendments have been made to the compensatory bat roost provision, this matter is not agreed.	
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8**	**Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** directs the	Not agreed

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		Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Table 5.4 in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** identifies the impact that the Project would have on Meadow Wood CWS and identifies the mitigation measures required to avoid and reduce the scale of this effect. With respect to pre-commencement works **7.4 Outline Landscape and Ecological Management Plan [REP5-157]** submitted at Deadline 5 includes the following text: *'All pre-commencement operations (as defined in Article 2(1) of the draft DCO (document reference 3.1) (Revision E)) must be carried out in accordance with the Outline LEMP. In doing so, where any measures referenced in the Outline LEMP are to be agreed with the relevant Local Planning Authority (LPA), National Grid and /or its Main Works Contractor(s) must seek the agreement of the relevant LPA before carrying out any pre-commencement operations to which those measures are relevant'.*	reader to **The Outline LEMP** (document reference 7.4) **[REP3-030]** has been produced to detail the additional environmental measures that would be implemented to avoid, minimise, mitigate and compensate (ecology only). REP3-030 considers additional mitigation measures for Meadow Wood Nature Reserve CWS. Further details regarding the impacts to the CWS because of electrical clearance are expected at deadline 7 and we understand Norfolk Wildlife Trust are in discussion with the applicant as to what this looks like. Document **7.4 Outline Landscape and Ecological Management Plan [REP5-157]** has been amended to include reference to pre-commencement works. The definition of pre-commencement operations includes reference to site clearance which would involve vegetation removal. Given that this can be undertaken prior to the detailed design and management plans being agreed by the LPA as pre-commencement, and details of what vegetation removal may be required for these operations, this matter is not agreed.	
EIA - Assessment Conclusions				
3.3.11	Construction effects - general	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B],** The	SNDC advised that this matter can be considered Agreed in a call held on 17.6.2026, noting that the Table 5.4 was amended at REP-	Agreed

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		assessment of effects during construction presented is considered appropriate. In this Chapter the habitat loss in the CWS was included in 'Table 8.23 Impact assessment including residual effects on ecology and biodiversity receptors during construction' under the heading Lowland Mixed Deciduous Woodland a Habitat of Principal Importance. The ancient woodland inventory does not identify this area as ancient woodland pasture, impacts to the veteran trees are identified in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].** Table 5.4 in **7.4 Outline Landscape and Ecological Management Plan [Revision G]** identifies the impact that the Project would have on Meadow Wood and identifies the mitigation measures required to avoid and reduce the scale of this effect. See BIO 1.3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** for further information.	303 and that Revision F will not be submitted until Deadline 6.	
3.3.11a	Construction effects - Meadow Wood Nature reserve County Wildlife Site	Meadow Wood Nature Reserve County Wildlife Site (CWS) is included within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** and impacts assessed under the broad-leaved woodland and veteran trees categories. Impacts to Meadow Wood Nature Reserve CWS only relate to an oversail of the bottom	SNDC advised this matter can be considered Agreed.	Agreed

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		corner, much of which is grassland and therefore will not be affected. The removal of the existing lower voltage wood pole lines will be a long-term benefit.		
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B],** The assessment of effects during operation (and maintenance) presented is considered appropriate. The only effect that the Project would have on Meadow Wood CWS during the operational (and maintenance) phase would be pruning to maintain electrical clearance this has been considered in the ES chapter in 'Table 8.24 Impact assessment including residual effects on ecology and biodiversity receptors during operation (and maintenance)'. See BIO 1.3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** for further information. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** identifies that bird diverters are to be used on a precautionary basis in two locations, there are no plans to apply this mitigation elsewhere on the Project, for the reasons provided in response to written questions, specifically BIO 1.13 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The Applicant will continue to engage with SNDC on this matter.	SNDC advised this matter can be considered Agreed. Supplementary planting may also be needed (see Table 5.4 of **7.4 Outline Landscape and Ecological Management Plan)** but otherwise agreed. We agree with the applicant's assessment and provision of bird diverters at the River Waveney as precautionary (updated shared by email 30th June 2026).	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** and is appropriate for managing construction impacts from the Project. **7.2 Outline Code of Construction Practice Appendix A - Environmental Constraints Plan [REP5-141]** was updated at Deadline 5 to also include the veteran trees. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision D]** details that any clearance of vegetation for soil stripping will be in line with the requirements set out in **7.4 Outline Landscape and Ecological Management Plan [Revision G],** which includes measures for removal and disposal of non-native invasive species. The Soil Resource Plan developed by the Main Works Contractor(s) prior to commencement of development will reference the requirements for vegetation removal (including invasive non-native species).	As the statutory consultee and licensing authority, Natural England has agreed the **Outline Code of Construction Practice [REP3-025]** is appropriate and adequate [Draft Statement of Common Ground - Natural England **[REP4-081].** **7.2 Outline Code of Construction Practice Appendix A - Environmental Constraints Plan (Final Issue A) [APP-301] -** has been updated to include veteran trees. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [REP-5-140]** has been amended to reference Soil Resource Plan, which will be informed by up to date surveys for invasive non-native species. It is noted that **7.2 Outline Code of Construction Practice [REP6-072] is to be submitted at Deadline 6** and is therefore not available. That said amendments at REP5 are agreed.	Agreed
3.3.14	Outline LEMP - general	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** and is appropriate.	It is noted that if either DESNZ or the local planning authority are responsible for the discharge of the Requirements, SNDC will be consulted when discharging Requirement 4.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The final LEMP's will be split by construction phase rather than district to ensure no confusion over delivery requirements by the contractors. It is noted that if either DESNZ or the local planning authority are responsible for the discharge of the requirements, SNDC will be consulted as appropriate.		
3.3.15	Protected Species Mitigation	The Applicant provided a response to this matter at as outlined in **8.4.1 Applicants Comments on Relevant Representations [REP2-024],** In April 2026, the Applicant received a Letter of No Impediment (LONI) from Natural England **(8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England [REP4-307])** confirming *'Natural England sees no impediment to licences to derogate for impacts to water vole being issued'.* A signed Impact Assessment and Conservation Payment Certificate for Great Crested Newts (GCN) has also been obtained from Natural England and signed by the Applicant. This confirms that the Applicant will apply for a GCN District Level Licensing (DLL) post consent and that Natural England agree to deliver the necessary mitigation.	SNDC provided the following comments in the relevant representations on 27 November 2025: • The Outline CoCP and OLEMP propose appropriate mitigation for badgers, with 10 setts identified in South Norfolk and 5 unavoidable across the full route. Subject to implementation, impacts on badgers under the Protection of Badgers Act 1992 are not considered significant. District Level Licensing will mitigate impacts on Great Crested Newts and no other licences are anticipated at this stage. However, further ecological surveys will be required at detailed design. If reptile translocation is necessary, the receptor site must be identified, secured and maintained for the lifetime of the scheme.	Agreed
3.3.16	Vegetation removal	The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined in **8.4.1 Applicants Comments on Relevant**	SNDC provided the following comments in the relevant representations on 27th November 2025: e General authorisation to remove vegetation	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Representations [REP2-024]. **7.2 Outline Code of Construction Practice [Revision G]** secured by Requirement 4 provides a structured process whereby vegetation removal is only determined following detailed survey, design refinement and plan approval (including any "site clearance" at pre-commencement stage). These measures ensure that decisions are informed by appropriate technical input and subject to formal approval by the relevant planning authority. With respect to pre-commencement works **7.4 Outline Landscape and Ecological Management Plan [REP5-157]** submitted at Deadline 5 includes the following text: *All pre-commencement operations (as defined in Article 2(1) of the draft DCO (document reference 3.1) (Revision E)) must be carried out in accordance with the Outline LEMP. In doing so, where any measures referenced in the Outline LEMP are to be agreed with the relevant Local Planning Authority (LPA), National Grid and /or its Main Works Contractor(s) must seek the agreement of the relevant LPA before carrying out any pre-commencement operations to which those measures are relevant.* All third parties would undertake works under the DCO in accordance with the **7.2 Outline Code of Construction Practice [Revision G]**	identified as "potentially affected" is inappropriate because it is ambiguous, too general and leaves the interpretation for National Grid's decision resulting in a lack of clarity for enforcement purposes. SNDC notes that pre-commencement works will be undertaken in advance of the detailed design. It is therefore possible that vegetation may be unnecessarily cleared should, for example, bell mouths be scoped out? Whilst this represents a worst-case scenario, we would expect ecological surveys to be completed to inform the detailed design and not vice versa. While pre-commencement works will be undertaken under the OLEMP and OCoCP neither document specifically cover the works. It is not clear if BT or LIKPN have been involved in their preparation **8.4.1 Applicants Comments on Relevant Representations [REP2-024]** (Appendix AA - South Norfolk District Council) and **7.2 Outline Code of Construction Practice (CoCP) [REP4-164]** has been reviewed **(Revision G** is not available until Deadline 6). SNDC maintain that ecological (and arboricultural) baseline needs to be completed prior to the detailed design. See response to ID 3.3.10 of this document. We remain concerned that pre-commencement works (including vegetation removal and bell mouth construction) will proceed prior to the detailed designs being finalised- resulting in the	

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		and **7.4 Outline Landscape and Ecological Management Plan [Revision G],** Paragraphs 2.2.3 to 2.2.7 of **7.2 Outline Code of Construction Practice [Revision G]** set out the pre-commencement operations that will take place following the grant of DCO consent, and emphasises that all pre-commencement operations must be carried out in accordance with the management plans, including **7.4 Outline Landscape and Ecological Management Plan Revision G],** unless otherwise agreed with the relevant planning authority. The Applicant confirms that relevant arboricultural surveys are being undertaken to inform detailed design.	unnecessary removal of vegetation.	
3.3.17	Habitat Management & Monitoring Period	National Grid has committed to a five-year aftercare period for all replacement tree and hedgerow planting (excluding the Environmental Areas), which is considered sufficient and standard for development consent projects of this scale. This is further strengthened by embedded commitments to high-quality planting specifications, ongoing monitoring, and adaptive management, including replacement of failed planting where necessary, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant has also committed to a 30-year aftercare period at Environmental Areas in line	SNDC maintain that aftercare should be for a ten-year period rather than five-years due to soil and climate conditions (see 3.3.17)	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		with the commitments made within **7.1 Biodiversity Net Gain Report [Revision B].** The Applicant does not agree that an assumed failure rate or additional compensation provision is necessary or justified, as the secured approach already provides a robust, flexible and responsive framework to ensure successful establishment Taken together, these measures provide confidence that habitat reinstatement will be effectively delivered and maintained, and that the proposed approach represents a proportionate, policy-aligned and deliverable solution. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Other matters as required				
3.3.18	Royden Fen CWS	**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** includes an ecological assessment of Royden Fen LNR and CWS. The assessment identifies, in the absence of mitigation, potential hydrological changes which may degrade habitats and associated groundwater dependent terrestrial ecosystems at Roydon Fen LNR and CWS. Standard pollution prevention mitigation measures set out within commitment GG32 of **7.2 Outline Code of Construction Practice [Revision G]** are proposed to ensure no residual effects on the LNR and CWS are encountered.	SNDC stated in the statutory consultation responses that Royden Fen CWS has been incorrectly identified as being located within Suffolk. It is not clear what the overhead line mitigation works involve and it is requested that the temporary attenuation drainage is re-designed to avoid the CWS, and a suitable buffer (works exclusion zone) provided around the CWS. The extent of hydrological impacts on the ecological interest of the CWS is of serious concern and must be clearly considered, for each CWS, within the ES. The inclusion of the CWS within the red line is	Agreed

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		The Applicant provided a response to this matter at Deadline 2 through **8.8.2 The Applicant's comments on Local Impact Reports [REP2-030].**	contrary to EN-1 Overarching National Policy Statement for Energy which states that projects should follow the mitigation hierarchy and avoid harm. The CWS should be avoided in its entirety and a suitable buffer provided between the works area and CWS boundary. SNDC provided the following comments in the relevant representations on 27th November 2025 The Council acknowledges that the route has largely been designed to avoid direct impacts on statutory designated sites, including Flordon Common SSSI, Forncett Meadows SSSI, Aslacton Parish Land SSSI and Shelfanger Meadows SSSI. However, their close proximity to the works raises concerns about potential indirect impacts during construction. Roydon Fen, a County Wildlife Site, is likely to experience direct impacts. While a compensation strategy via the Waveney and Little Ouse Recovery (WaOL) Project is proposed, no justification has been provided for why avoidance or mitigation measures were not considered. This lack of explanation is unacceptable. Compensation can only be acceptable if there are no alternative means of delivering the project without the harms or routes to harm. SNDC advised that this matter can now be considered agreed in a call held 17.6.2026.	

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.3.19	Waveney Valley Alternative (WVA)	The Applicant has noted these comments. The overhead line design has been taken forward in this area that would minimise ecological impacts in the Waveney Valley.	SNDC stated in the statutory consultation responses that there was concern about the ecological impacts of both the proposed overhead line and Waveney Valley Alternative and the potential for loss of irreplaceable habitats. SNDC advised that this matter can be considered No longer relevant in a call held on 17.6.2026.	No longer relevant
3.3.20	Biodiversity Net Gain (BNG)	Although not currently mandatory for NSIP applications, the Applicant is committed to delivering a minimum of 10% BNG for the Norwich to Tilbury scheme. This 10% net gain will be delivered through a combination of on site and offsite measures. The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025.	SNDC stated in the statutory consultation responses that BNG should be secured as part of the Development Consent Order and maintained for at least 30 years (if not the lifetime of the project).	Agreed
3.3.21	Arboriculture Impact Assessment (AIA)	The Applicant issued the draft AIA in March 2025. The AIA has been prepared in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** and is considered appropriate. **7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Outline Code of Construction Practice [Revision G]** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable.	South Norfolk Council is concerned that the Arboricultural survey has identified multiple significant trees that will be compromised by the current proposals; these include several irreplaceable veteran specimens. As the survey has been undertaken subsequent to the design of a route alignment, it is requested that a review is undertaken in light of the findings in order to address the first principle of mitigation - avoidance - in respect of the veteran and other most significant trees. It is disappointing the detailed survey data regarding the trees is not presented at this stage for our information.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant confirms that trees were considered within the iterative design process. **5.15 Design Development Report [APP-122]** details a number of alignment design variations that were considered and selected due to their avoidance or reduction of impacts on veteran trees. The Applicant confirms that site meetings and surveys are currently underway with the intention to reduce impacts to high value and veteran trees as part of detailed design. Commitment GG14 in **7.2 Outline Code of Construction Practice [Revision G]** confirms that for relevant parts of the Project, further arboricultural surveys will be undertaken to reduce impacts on trees and hedgerows, this is intended to inform any additional measures needed where avoidance has not been possible, in line with the mitigation hierarchy. The applicant confirms that further arboricultural surveys will be completed pre-commencement, in accordance with commitment GG14 in **7.2 Outline Code of Construction Practice [Revision G]** and paragraph 4(3) of Requirement 4: Construction Management Plans in **3.1 Draft DCO [Revision G].**	Detailed Arboricultural surveys will only be undertaken upon completion of the Detailed Design. Impacts cannot therefore be avoided as the design has been assured. In line with best practice detailed ecological and arboricultural surveys must inform the detailed design to enable impacts to be avoided in the first instance. 26/6/26 at the hearing on 25th June 2026 it was noted that surveys are underway. We await further information at Deadline 6 or 7 with regards to how the mitigation hierarchy has been followed and impacts avoided and minimised.	

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3.4 Air Quality

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Air Quality assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	SNDC confirm agreement in this matter.	Agreed
EIA - Approach and Methods				
3.4.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** The Applicant used information from the publicly available South Norfolk 2024 ASR as highlighted in **6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [Revision B],** Data published in the council's ASR is verified and validated and is considered to be reliable	SNDC understand that the AQ assessment was undertaken using data from the Annual Status Report which was gathered from our website. However, the data used in that report would have been based on diffusion tube results. If the consultant had contacted us, we would have been able to supply much more accurate data which we have collected using our Zephyrs. While the diffusion tubes collect data for NO2, the Zephyrs provided	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		data, appropriate for this air quality assessment. The 2024 ASR does not present data from the council's Zephyr monitors. It determined that the capability of the monitors was indicative only and at the time operating on a trial basis only. On 24/06/2026 SNDC shared data from one zephyr monitor located outside The Swan Inn, Long Stratton. This location is outside of the 2 km buffer around the Order Limits boundary, which is used to gather the baseline monitoring data. The zephyr monitor is also located approximately 4 km from the Affected Road Network (ARN), which is used to inform emissions sources in the construction traffic emissions assessment. Had this data been available at the time of the assessment, it would not have been suitable to include it in the baseline assessment and nor would it have been representative of air pollutant concentrations on the ARN. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	data for PM10, PM2.5 and PM1 as well as for NO2. This is important data which the consultant could have used to develop a more accurate and detailed model of the existing air quality situation and the impact that the development will have. SNDC's data is more accurate than the diffusion tubes used in the AQ assessment and as such should be used. While it is acknowledged that the site of the Zephyr is outside of the 2km order limit used in the assessment it still provides more accurate data then used in the assessment and as such should have been included. I would also point out that the zephyr is not being used on a trial basis, and it was always envisioned that the Zephyr located in Long Stratton would be a permanent monitoring location.	
3.4.4	Assessment methodology	The methodology for assessing Air Quality was agreed through **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** The key parameters and assumptions presented are considered appropriate.	SNDC understand that the AQ assessment was undertaken using data from the Annual Status Report which was gathered from our website. However, the data used in that report would have been based on diffusion tube results. If the consultant had contacted	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant used information from the South Norfolk 2024 ASR as highlighted in **6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [Revision B],** Data published in the council's ASR is verified and validated and is considered to be reliable data, appropriate for this air quality assessment. The 2024 ASR does not present data from the council's Zephyr monitors. It determined that the capability of the monitors was indicative only and at the time operating on a trial basis only. On 24/06/2026 SNDC shared data from one zephyr monitor located outside The Swan Inn, Long Stratton. This location is outside of the 2 km buffer around the Order Limits boundary, which is used to gather the baseline monitoring data. The zephyr monitor is also located approximately 4 km from the Affected Road Network (ARN), which is used to inform emissions sources in the construction traffic emissions assessment. Had this data been available at the time of the assessment, it would not have been suitable to include it in the baseline assessment and nor would it have been representative of air pollutant concentrations on the ARN. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	us, we would have been able to supply much more accurate data which we have collected using our Zephyrs. While the diffusion tubes collect data for NO2, the Zephyrs provided data for PM10, PM2.5 and PM1 as well as for NO2. This is important data which the consultant could have used to develop a more accurate and detailed model of the existing air quality situation and the impact that the development will have. SNDC's data is more accurate than the diffusion tubes used in the AQ assessment and as such should be used. While it is acknowledged that the site of the Zephyr is outside of the 2km order limit used in the assessment it still provides more accurate data then used in the assessment and as such should have been included. I would also point out that the zephyr is not being used on a trial basis, and it was always envisioned that the Zephyr located in Long Stratton would be a permanent monitoring location.	
EIA - Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air**	No contact has been made with SNDC to obtain our monitoring data.	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Quality [Revision B]. The baseline conditions and receptors presented are considered appropriate. The Applicant used information from the publicly available South Norfolk 2024 ASR as highlighted in **6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [Revision B].** Data published in the council's ASR is verified and validated and is considered to be reliable data, appropriate for this air quality assessment. The 2024 ASR does not present data from the council's Zephyr monitors. It determined that the capability of the monitors was indicative only and at the time operating on a trial basis only. On 24/06/2026 SNDC shared data from one zephyr monitor located outside The Swan Inn, Long Stratton. This location is outside of the 2 km buffer around the Order Limits boundary, which is used to gather the baseline monitoring data. The zephyr monitor is also located approximately 4 km from the Affected Road Network (ARN), which is used to inform emissions sources in the construction traffic emissions assessment. Had this data been available at the time of the assessment, it would not have been suitable to include it in the baseline assessment and nor would it have been representative of air pollutant concentrations on the ARN. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	No contact was made directly with SNDC to obtain our monitoring data, as now reflected in the applicant's comments that they used publicly available data on the Council's website. Subsequently, SNDC shared the data and consider that SNDC's data is more accurate than the diffusion tubes used in the AQ assessment and as such should be used. While it is acknowledged that the site of the Zephyr is outside of the 2km order limit used in the assessment it still provides more accurate data then used in the assessment and as such should have been included. I would also point out that the zephyr is not being used on a trial basis and it was always envisioned that the Zephyr located in Long Stratton would be a permanent monitoring location.	

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Air Quality effects, are set out in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B].** The embedded mitigation that is relevant to air quality on this Project is route alignment and the inclusion of an almost continuous haul road. The alignment of both is enforced through the Order Limits and the Development Consent Order (DCO) AQ01 of **7.2 Outline Code of Construction Practice [Revision G]** under the title of "Preparing and maintaining the site" states *"Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as practical or possible".* This would apply to the generators discussed with SNDC on 24 June 2026. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The use of a haul road and avoiding population centres is standard practice for this type of development. Further embedded measures should be included, including the judicial siting of compounds and designing the proposed works to minimise air pollution. Full details will be provided as part of the COCP and cannot be agreed at this stage due to the lack of definitive information.	Not agreed
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan**	The proposals are generally acceptable, however, the measures required at each point along the route will have to be designed in relation to the proposed works to be carried out at each location. There are ongoing discussions on this matter as the applicant has indicated and so this cannot be agreed at this stage.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		[Revision D] requires the preparation of a dust risk assessment and a dust management plan for each work package of the construction phase. Each dust management plan will be responsive to the local conditions and activities planned for each work package. This should accommodate the concerns regarding the specificity of measures raised by SNDC. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], 7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D].** **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]** requires the preparation of a dust risk assessment and a dust management plan for each work package of the construction phase. Each dust management plan will be responsive to the local conditions and activities planned for each work package. Whilst specific construction activities for each work package cannot at this stage be agreed, the	As the proposed method of construction has not been stipulated at this time, SNDC cannot agree that the additional mitigation will be appropriate and adequate.	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		functions outlined in the **7.2 Outline Code of Construction Practice [Revision G] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]** mean that construction would not commence until it is determined there would be no likely significant effect from construction dust following the implementation of mitigation. Additionally Requirement 4(1) of **3.1 Draft DCO [Revision G]** states *"No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (in consultation with Natural England in the case of the landscape and ecological management plan) or other discharging authority as may be appropriate to the relevant plan concerned."* The Applicant considers this should provide suitable reassurance that additional mitigation would be appropriate and adequate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Assessment Conclusions				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B],** The assessment of effects during construction presented is considered appropriate. **7.2 Outline Code of Construction Practice**	This is generally accepted. However, the main contractor will have to reassess the impact once the actual construction techniques are established. Whilst this is the responsibility of the individual contractors, as the developer,	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Appendix D - Outline Dust Management Plan [Revision D] requires the preparation of a dust risk assessment and a dust management plan for each work package of the construction phase. Each dust management plan will be responsive to the local conditions and activities planned for each work package. This will be produced by the mains works contractor, overseen and approved by National Grid. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	National Grid will have to agree those contracts and so what mechanism is in place to ensure these are adhered to.	
3.4.11	Operational (and maintenance) effects	Effects related to maintenance and operational traffic are not quantified as this assessment was screened out in **6.19 Scoping Report [APP-296]** and was agreed within **6.20 Scoping Opinion [APP-297],**	This is not in this section but is agreed,	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and is appropriate for managing construction impacts from the Project. Mitigation measures are outlined in the Dust Management Plan that forms part of **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision D]** and in commitments AQ01 and AQ02 of **7.2 Outline Code of Construction Practice [Revision G].**	The Outline Code of Construction Practice does not list the mitigation measures it merely points to the Air Quality Chapter. The mitigation measures presented are general and generic. We also note that the mitigation measures and monitoring is to be confirmed by the Main Contractor, who will be producing their own dust management plan which we have not seen at this time. As such not agreed.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

3.5 Noise and Vibration

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 14.2 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	SNDC position following review of the ES documents is that this matter is agreed.	Agreed
EIA - Approach and Methods				
3.5.2	Study area	The study area was agreed through the **EIA 6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within **Section 14.4 of 6.14 Environmental Statement**	No monitoring has been undertaken at all to provide details of the background noise levels.	

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Chapter 14 - Noise and Vibration [Revision B], Lower thresholds, based on Category A of the 'ABC' method described in Annex E.3.2 of BS 5228 have been used in the construction noise assessment. The Category A thresholds are suitable for quiet rural environments. Baseline surveys are therefore not required to inform the assessment of construction noise where it is acknowledged that ambient noise levels are low. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Whilst it is agreed that Category A is designed for the lowest level of environmental noise, it is considered that to provide an adequate assessment, background monitoring should be undertaken. This will also provide details on the scale of the impact which the development would have. Table 4.3 in **Document 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan - Tracked Changes Version** has been incorrectly replicated from BS5228. As such, this matter is not agreed.	
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.5	Key parameters and assumptions	Key parameters and assumptions associated with Noise and Vibration are summarised in **Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The key parameters and assumptions presented are considered appropriate. Percussive piling has been assumed in the assessment as a worst-case. The use of an alternative method, where this can be done, would result in lower noise and vibration levels. Where percussive piling is required and an alternative method cannot be used, best practicable means (BPM) will be employed to	The assessment has been based on the use of percussive piles for the foundations of the pylons while the geotechnical assessment has not been undertaken to detail which foundation method is more appropriate. This has formed part of the discussions at the hearings, and it was our understanding that the applicant had objected to applying to the LA to agree position and pile types. Until this position has been clarified this matter is not agreed.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		reduce effects as far as possible. Specific mitigation measures will be determined by the contractor following their detailed assessments. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** and the **7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan (NVMP) [Revision D],** Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of **7.2 Outline Code of Construction Practice [Revision G], 7.2 Outline Code of Construction Practice [Revision G]** also includes a number of other related commitments. At Deadline 4, Commitment NV23 **[REP4-164]** has been updated to clarify the position on percussive piling, stating: *[1]"For the construction of pylon foundations, non-percussive piling methods will be used, except where the results of ground investigations reveal that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing."* Commitments NV05 and NV01 were updated at		

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Deadline 5 **(7.2 Outline Code of Construction Practice [REP5-139])** to clarify that detailed construction noise and vibration assessments will be prepared by the contractor and submitted to the relevant local planning authorities for approval as part of the detailed Noise and Vibration Management Plan. The assessments will take account of the specific construction methodologies for each works activity. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Baseline Conditions				
3.5.6	Baseline conditions and receptors	The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B] and 6.14.F1 Environmental Statement Figure 14.1 Baseline Noise Data [APP-262],** The baseline conditions and receptors presented are considered appropriate. The assessment assumes that baseline noise levels are low along the route. As such, the lowest threshold for potential significant adverse effects from the 'ABC' method is used. There is therefore no need to undertake surveys. Surveys would only serve to potentially increase the threshold, where applicable. This is therefore proportionate, and worst-case. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The receptors have been identified but the base line noise levels have not been undertaken. The noise levels which the receptors would be subjected to has not been provided merely isolines of rough predicted noise levels. No details have been provided of the predicted noise level for each of the receptors along the route. This has nothing to do with the adoption of the ABC method this is a request that the data relating to the predicted noise levels at the identified receptor be provided. The applicant has already done the model so the data can be easily produced. Not agreed.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Embedded, Standard and Additional Mitigation Measures				
3.5.7	Mitigation (embedded, standard, additional)	Embedded, standard and additional mitigation measures relevant to Noise and Vibration effects are set out in Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** Embedded mitigation measures are designed as an inherent part of the Project relevant to Noise and Vibration effects, standard mitigation measured are intended to reduce potential effects during construction. The assessment does not include mitigation such that noise and vibration 'hot-spots' can be identified where mitigation is required to avoid significant adverse effects. Best practicable means (BPM) will be employed by the contractor(s) to avoid significant adverse effects and reduce adverse effects. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of Construction Practice Appendix F: Outline NVMP [Revision D],** Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of **7.2 Outline Code of Construction Practice [Revision G]. 7.2 Outline Code of Construction Practice**	The report does not propose any embedded mitigation measures as the report states that they will use BS5228 but that Main Works Contractor will decide on the proposed mitigation measures once they have done their own assessment. The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans. The revised report needs to clearly state what the levels of vibration will be permitted. The NVMP states that the main contractor will 'normally' limit vibration arising from site activities at any residential building to a level of 1.Omm/s PPV. This needs to be altered to reflect other DCOs which is that a warning level of 0.3mms PPV will be set with a stop level of 1.Omm/s PPV. This will stop any potential damage to buildings while also protecting the amenity of the vulnerable receptors. As such, this matter is still not agreed.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		[**Revision G**] also includes a number of other related commitments. With regards to "The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans", this is incorrect. The assessment considers both potential effects on people, as well as potential damage to buildings and structures. The criteria for the effects of vibration on people are provided in Table 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** whilst the assessment is provided in paragraphs 14.7.23 to 26. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Assessment Conclusions				
3.5.8	Construction effects	The assessment of effects during construction is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The assessment of effects during construction presented is considered appropriate. The assessment does not include mitigation such that noise and vibration 'hot-spots' can be identified where mitigation is required to avoid significant adverse effects. Best practicable means (BPM) will be employed be the contractor(s) to avoid significant adverse effects and reduce adverse effects. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific	The report does not propose any embedded mitigation measures as the report states that they will use BS5228 but that Main Works Contractor will decide on the proposed mitigation measures once they have done their own assessment. The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans. The revised report needs to clearly state what the levels of vibration will be permitted. The NVMP states that the main contractor will 'normally' limit vibration arising from site activities at any residential building to a level of 1.Omm/s PPV. This needs to be altered to	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		methodologies by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G] and 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan [Revision D],** Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of **7.2 Outline Code of Construction Practice [Revision G], 7.2 Outline Code of Construction Practice [Revision G]** also includes a number of other related commitments. With regards to "The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans", this is incorrect. The assessment considers both potential effects on people, as well as potential damage to buildings and structures. The criteria for the effects of vibration on people are provided in Table 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** whilst the assessment is provided in paragraphs 14.7.23 to 26. The criteria for the effects of vibration on buildings and structures are provided in paragraph 14.4.26 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** whilst the assessment is provided in paragraphs 14.7.27 to 30.	reflect other DCOs which is that a warning level of 0.3mms PPV will be set with a stop level of 1.0mm/s PPV. This will stop any potential damage to buildings while also protecting the amenity of the vulnerable receptors. As such, this matter is still not agreed.	

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.5.9	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate. With regards to "The operation effects were assessed, but the proposed line of pylons is not definite and is subject to change. As such the operation effects cannot be said to be truly quantified", this is incorrect. A low noise 'triple araucaria' conductor system (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons) is proposed and committed to via commitment GG13 of **7.2 Code of Construction Practice [Revision G].** Adverse effects from operational noise are not expected, even directly underneath the line. This is therefore the case irrespective of any movement within the Limits of Deviation (LoD). Although scoped out of the ES, information relating to operational noise from the overhead line is presented in **6.14 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines Informative [APP-261],** The Applicant is committed to continue discussions with BMSDC, which will likely	The operation effects were assessed, but the proposed line of pylons is not definite and is subject to change. As such the operation effects cannot be said to be truly quantified. This can be placed as under discussion. The report is quite clear as to what it is saying, but confirmation that this is the case is required from the main contactor should there be any changes.	Under discussion

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ID	Matter	National Grid's Position	SNDC's Position	Status
		conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.10	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** and is appropriate for managing construction impacts from the Project. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G] and 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan [Revision D],** Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of the **7.2 Outline Code of Construction Practice [Revision G] The 7.2 Outline Code of Construction Practice [Revision G]** also includes a number of other related commitments. Commitments NV05 and NV01of **7.2 Outline Code of Construction Practice [REP5-139]** were updated at Deadline 5 to clarify that detailed construction noise and vibration assessments will be prepared by the contractor and submitted to the relevant local planning	The CoCP includes generalities with regards to mitigation measures but also states that it will be the Main Contractors role to establish the mitigation measures. Therefore, the report is unacceptable. SNDC cannot agree to this until we see the report from the main contractor, which is standard in cases like these.	

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ID	Matter	National Grid's Position	SNDC's Position	Status
		authorities for approval as part of the detailed Noise and Vibration Management Plan. The assessments will take account of the specific construction methodologies for each works activity. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Other matters as required				
3.5.11	Percussive Piling	The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined in **8.4.1 Applicants Comments on Relevant Representations [REP2-024].** With regards to "The project appears to rely entirely on percussive piling", this is incorrect. Percussive piling has been assumed in the assessment as a worst-case. The use of an alternative method, where this can be done, would result in lower noise and vibration levels. Where percussive piling is required and an alternative method cannot be used, best practicable means (BPM) will be employed to reduce effects as far as possible. Specific mitigation measures will be determined by the contractor following their detailed assessments. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** and **7.2 Outline Code of**	SNDC provided the following comments in the relevant representations on 27 November 2025 • The project appears to rely entirely on percussive piling, which is a major source of noise and vibration nuisance. No justification for this approach has been provided and critically, no geo-environmental or geotechnical investigations have been undertaken to confirm whether percussive piles are appropriate for site conditions. Without this information, the suitability of pile types cannot be established. Once pile types are confirmed, the noise and vibration assessment must be revised to reflect actual construction methods. The vibration assessment should also include impacts from construction traffic, consistent with approaches adopted in other DCOs such as Hornsea 3 Offshore Wind Farm. That assessment is currently missing.	Not agreed

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		Construction Practice Appendix F: Outline Noise and Vibration Management Plan [Revision D], Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of **7.2 Outline Code of Construction Practice [Revision G], 7.2 Outline Code of Construction Practice [Revision G]** also includes a number of other related commitments. At Deadline 4 **(7.2 Outline Code of Construction Practice [REP4-164]),** Commitment NV23 has been updated to clarify the position on percussive piling, stating: [11] *"For the construction of pylon foundations, non-percussive piling methods will be used, except where the results of ground investigations reveal that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing."* Commitments NV05 and NV01 were updated at Deadline 5 **(7.2 Outline Code of Construction Practice [REP5-139])** to clarify that detailed construction noise and vibration assessments will be prepared by the contractor and submitted to the relevant local planning authorities for approval as part of the detailed Noise and Vibration Management Plan. The assessments will take account of the specific construction	• Percussive piling must be agreed with the LPA if intended for use, not just notified and should be avoided as a construction method. This has formed part of the discussions at the hearings, and it was our understanding that the applicant had objected to applying to the LA to agree position and pile types. Until this position has been clarified Not Agreed.	

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		methodologies for each works activity. Construction traffic vibration is scoped out of the ES, as agreed in the scoping opinion, on the basis that vibration is caused by irregularities in the road surface (e.g. potholes) and it is assumed that the road surface will be well maintained by the relevant highways authority. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

Health and Wellbeing

Matters relating to Health and Wellbeing will be responded to by Norfolk County Council.

3.6 Historic Environment

Comments from SNDC regarding Historic Environment relate to Built Heritage only. SNDC defer to Norfolk County Council for archaeological advice.

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to the Historic Environment

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 11.2 of **Environmental**	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Statement Chapter 11 - Historic Environment [Revision D]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA - Approach and Methods				
3.6.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through subsequent thematic group meetings where further comments were addressed.	Agreed
3.6.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].**	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.4	Assessment methodology	The Scoping Opinion stated: *"The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities."*	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.5	Key parameters and assumptions (General)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D],** The key parameters and assumptions presented are considered appropriate.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.6.6	Key parameters and assumptions (Viewpoints)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D],** The key parameters and assumptions presented are considered appropriate. Regarding the positioning of the viewpoints which have been discussed with the Council the Applicant has provided further information and updated visualisations in response to ExQ1 HE 1.13 as outlined in **8.9.1 Applicants Responses to First Written Questions [REP3-074],** The update to Action Point 25 in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]** set out the viewpoints for which LoD visualisations are provided. For SNDC these are 1.22, HE2(i), HE2(ii) and HE21. LoD visualisations were not provided for 1.01 and 1.04 as the Applicant considers that changes in the Project, within the LoD, would not be noticeable in longer distance views due to the reducing scale of the Project and perspective. A visualisation is provided from Viewpoint 4.01 (approximately 1.16 km from the Project) in **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations [REP5-195 to REP5-198]** to demonstrate this point. The Applicant considers that through ongoing engagement between the parties, this matter can	SNDC reserve comments on this matter subject to reviewing additional visualisations submitted by NG at Deadline 5. SNDC confirmed their agreement on this matter during a call on 22 June 2026.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		be moved to Agreed following consideration of the additional viewpoints provided at Deadline 5.		
EIA - Baseline Conditions				
3.6.7	Baseline conditions and receptors	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].** The baseline conditions and receptors presented are considered appropriate.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.6.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC does not consider this matter applicable for this topic as the nature of the activities is not going to damage assets.	Not Applicable
3.6.9	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section **11.6** of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and set out in **7.2 Outline Code of Construction Practice [Revision G]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC does not consider this matter applicable for this topic.	Not Applicable
3.6.10	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11 -**	SNDC wish this matter to remain under discussion subject to further conversations anticipated in week 2 of ISH's.	Agreed

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		Historic Environment [Revision D]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Additional mitigation for built heritage would likely take the form of specific screening planting, which has been considered for any significant residual effects. However, the introduction of measures such as additional planting to screen the Project in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest. The Applicant reviewed all of the significant effects to bult heritage in South Norfolk and do not consider that additional mitigation would be appropriate for the reasons set out above.	SNDC confirmed their agreement on this matter during a call on 22 June 2026.	
EIA - Assessment Conclusions				
3.6.11	Construction effects	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].** The assessment of effects during construction presented is considered appropriate.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].** The assessment of effects during operation (and	SNDC disagreed with the level of harm that has been attributed and assessed on a number of heritage assets as set out in our Relevant Representation and Local Impact Report.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		maintenance) presented is considered appropriate The Applicant provided responses to SNDC regarding the conclusions of assessment for specific listed buildings in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023].** For all other assets the Applicant understands SNDC to be in agreement with the conclusions of assessment. The specific designated assets with which SNDC disagrees with the conclusions of assessment are contained in matters 3.6.14 - 3.6.19 of this SoCG and the position for each is stated. On this basis the Applicant considers that this matter can be moved to agreed.	SNDC confirmed their agreement on this matter during a call on 22 June 2026 with the exception of the assets listed in matters 3.6.14-3.6.19.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.13	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and is appropriate for managing construction impacts from the Project.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
Other matters as required				
3.6.14	Church of All Saints	The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP2-033].** The Applicant has also provided further response regarding this	SNDC provided the following comments in the relevant representations on 27th November 2025 • Church of All Saints, Tibbenham (1049992) - Grade I (Sections 3.2.369 & 3.2.370)	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		asset in ExQ1 HE 1.18 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)144. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** and assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D],** views to and from the asset from designated assets within its vicinity have been considered. Therefore, the conclusions of assessment for the Church of All Saints are considered to be appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	- The baseline report states that the church's setting is informed by its roadside location within Tibbenham and nearby village assets. However, this underplays its prominence: the church's substantial tower is highly visible across the parish to the west, including from Manor House and Diss Road. Approaching from Mill Road, views of the tower reinforce the important status of the building within the parish. The front elevation of Manor House (1179387) appears deliberately designed with bay windows to capture views of the church across open fields. - While the report acknowledges that the setting extends to the order limits with views to the northwest, it fails to recognise the church's role as a landmark within the wider parish setting and the intervisibility between heritage assets, which will be significantly compromised by pylons and wires. Given the church's high grade and value, the impact should be assessed as moderate adverse significant of effect, equating to mid less than substantial harm, not "lower less than substantial" as currently stated. SNDC agree to disagree with the level of harm that has been attributed to these assets	BH BH BH BH BH ~~MBBB~~ MMB

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.6.15	Church of St Remigius	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has also responded regarding this asset in the Applicant's Deadline 2 response to the Written Representation from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-031],** in response to paragraphs 2.17 - 2.23. The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)145. **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D])** and Lower Less Than Substantial Harm **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B])** is	SNDC provided the following comments in the relevant representations on 27th November 2025 • Church of Remigius (1050237) Grade I (3.2.403 & 3.2.404) - The setting is informed by "its location on the northern edge of the Waveney Valley with views over the valley to the south." For much of its history the church was set within a rural location, and although there is urban development, the aspect to the south remains rural and well preserved. The pylons and wires will have a significant and intrusive detrimental impact on the relationship of the church with its rural hinterland to the south that is well preserved, including views of the church from the Angles Way footpath. Although the assessment states that the setting makes a moderate contribution, this has taken into account the change to the rural setting to the north as part of the setting, however the setting to the south remains preserved and therefore 7 continues to make a considerable contribution to the significance of the asset as the remaining well preserved element of the setting. There is moderate adverse significant of effect and therefore significant, and the level of	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	harm should be mid less than substantial harm. SNDC agree to disagree with the level of harm that has been attributed to these assets	
3.6.16	Kenningham Hall	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)146. The Applicant disagrees with the council and considers the current assessment to be appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC provided the following comments in the relevant representations on 27th November 2025 • Kenningham Hall (1373056) - Grade II (Section 3.2.472) - During the operational phase, the proximity of industrial pylons will cause a significant visual intrusion into the hall's setting, which currently makes a considerable contribution to its value. Despite some vegetation, the scale and closeness of pylons and wires will remain highly visible from all directions. The impact should not be considered moderate adverse harm and significant and thus should equate to mid less than substantial harm and not low substantial harm. SNDC agree to disagree with the level of harm that has been attributed to these assets	Not Agreed
3.6.17	Elm Farmhouse	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The discrepancy between the Environmental Impact Assessment, as presented in **6.11.A2**	SNDC provided the following comments in the relevant representations on 27th November 2025 • Elm Farmhouse (1373558) - Grade II (Sections 3.2.574 & 3.2.575) - The farmhouse's setting is defined by its agricultural and rural context, which	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision D] and the assessment of harm, as presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]** and the incorrect compass direction have been addressed in 8.1 Errata List. The assessment of harm now reads as follows: 'The Grade II Listed 'Elm Farmhouse' is located west of Hapton. During the operation phase, the Project would be partially within the setting of the medium value asset. The operation phase of the Project would impact the asset's setting through the introduction of pylons RG27-29, the closest of which (RG28) would be located c. 190 m north-north-west of the asset. The setting of the asset is informed by the surrounding agricultural landscape, with which the asset has a historical relationship and possibly ongoing functional relationship. The setting is further informed by the asset's surviving non-designated outbuildings to the east and west and which are recorded on the first edition OS map of 1884. The Project would impact the views of the agricultural landscape to the north-north-west (RG28) as the pylon would be visible above the hedgerow which defines the asset's garden, and to the south-west where pylon RG29 is located c. 220 m away. The Project would result in a small change to the setting of the asset resulting in a minor impact on its value. It is concluded, therefore, that the asset would experience Lower Less Than Substantial	contributes considerably to its significance. The proximity of pylons and wires will substantially alter this setting, resulting in moderate adverse significant of effect and significant, not "minor adverse" as stated. The conclusion of mid less than substantial harm is appropriate. Note: Elm Farmhouse is located west of Hapton, not East. SNDC agree to disagree with the level of harm that has been attributed to these assets	

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Harm.' The Applicant considers the assessment of Elm Farmhouse to be appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.6.18	Manor House	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has also provided further response regarding this asset in ExQ1 HE 1.18 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The assessment of Manor House (1179387) has been reviewed and the Applicant is confident in its Lower Less Than Substantial Harm assessment for Manor House **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B])** and minor adverse (not significant) effect **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables**	SNDC provided the following comments in the relevant representations on 27th November 2025 • Manor House (1179387) - Grade II - Currently assessed as "minor adverse" significant of effect and therefore not significant underestimates the importance of intervisibility with Tibbenham Church. The House's front elevation, including bay windows, appears deliberately oriented to capture views of the church tower across open fields. This design intention amplifies the significance of the relationship. The impact should be moderate adverse significance of effect, equating to mid less than substantial harm. SNDC agree to disagree with the level of harm that has been attributed to these assets	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		[Revision D]). While the view from the asset back towards the bell tower of the Church of All Saints (1049992) would include overhead wires should the Project go ahead, the church is c. 1.3 km to the east of the asset and therefore a comparatively distant feature in views. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.6.19	Flordon Hall	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Should the Project go ahead, it would result in the addition of five pylons (RG19-RG23) within 1 km of the asset. The pylons would run on a north-east/south-west alignment from the north of the asset (RG19) to the south-west of the asset (RG23). At its nearest point (RG21) the Project would be c. 270 m to the north-west of the asset. It is acknowledged that the Project would traverse farmland still likely associated with the Hall and associated	SNDC provided the following comments in the relevant representations on 27th November 2025 • Flordon Hall (1050698) - Grade II* - Flordon Hall's setting is informed by its agricultural landscape and historic farmyard. Built c.1600 by the Kemp family, its E-shaped plan facing East was a conscious design statement intended to be viewed across open farmland, particularly from Long Lane. The Tithe Map of c1840 shows the fields between Long Lane and Hall marked with K which can be taken as being owned by the Kemps and associated with the Hall. Pylons and wires, while not blocking views, will introduce a dominant presence, undermining this design intention. Given the asset's high grade and 8 significance, the harm should be considered high less than substantial	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		farmstead. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** the intervening landscape between the asset and Project includes buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055)). The asset can be viewed from Long Lane c. 480 m to the south-east, and this view would include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. This is because the Upper Less Than Substantial Harm category requires: '...changes within the setting of the designated asset (or elements of its setting) that contribute to its value would significantly alter a large proportion of the setting of the asset that contributes to its value.', as set out in the	harm. SNDC agree to disagree with the level of harm that has been attributed to these assets	~~mMM||~~ M M M

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ID	Matter	National Grid's Position	SNDC's Position	Status
		methodology which was informed by PPG paragraph 18 **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [Revision B]).** The Applicant is confident the level of harm to the asset does not meet this threshold. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

3.7 Landscape and Visual

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 13.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B],** All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Approach and Methods				
3.7.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].**	The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops. In the meeting held on 3rd December 2024, the viewpoints, with the exception of the Waveney Valley, were discussed and agreed by the representatives of NCC and SNDC. SNDC would want to review any further potentially significant changes to the project and be given the opportunity to consider any changes needed to the viewpoints.	Agreed
3.7.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].**	SNDC position following review of the ES documents is that this matter is agreed.	Agreed
3.7.4	Assessment methodology (including LVIA methodology and viewpoints)	The assessment methodology is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B].** The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [Revision B],** Visualisations are provided in **7.12 Visualisations [APP-343 to APP-351].**	The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops In the meeting held on 3rd December 2024, the viewpoints, with the exception of the Waveney Valley, were discussed and agreed by the representatives of NCC and SNDC. SNDC would want to review any further potentially significant changes to the project and be given the opportunity to consider any changes needed to the viewpoints.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The key parameters and assumptions presented are considered appropriate.	SNDC position following review of the ES documents is that this matter is agreed.	Agreed
EIA - Baseline Conditions				
3.7.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The baseline conditions and receptors presented are considered appropriate.	SNDC position following review of the ES documents is that this matter is agreed.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** and also Paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant has concluded that overhead line is the appropriate technology choice at the Waveney Valley, for the reasons set out in Section 3.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed	SNDC does not agree as the applicant has not proceeded with undergrounding in the Waveney Valley considering the sensitivity of this landscape.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.7.8	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] and 7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC accept the proposed standard mitigation set out in the ES	Agreed
3.7.9	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030],** Whilst not additional mitigation and comprising compensation, the Applicant engaged with Local Authorities in relation to Action Point 27 of ISH2	SNDC do not agree that no additional mitigation is being provided as part of the application given the significance of the identified harms.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		[EV9-023] and submitted **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REPS-199]** at Deadline 5. This document contains plans which set out the constraints and indicative opportunities relating to topics of interest at certain locations, as set out in ExQ1 LV 1.28. The Applicant's position on compensation and the status of these plans is set out in Section 2.5 of **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199].** Without prejudice to the Applicant's position, the Applicant has been engaging with NCC in relation to these compensatory measures in the Waveney Valley and refining the mechanism to secure them. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Assessment Conclusions				
3.7.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and supporting appendices. The assessment of effects during construction presented is considered appropriate.	SNDC agree with the level of harm that has been assessed as significant adverse in the ES.	Agreed
3.7.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and supporting appendices. The assessment of effects during operation (and maintenance) presented is considered appropriate.	SNDC agree with the level of harm that has been assessed in the ES across the different landscape character areas.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate for managing construction impacts from the Project.	Following revisions to the oCoCP, SNDC are satisfied that these secure the mitigation set out in the ES for the construction phase of the Project.	Agreed
3.7.13	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate.	Following revisions to the oLEMP, SNDC are satisfied that this sets out the details of the mitigation measures and secures the Ecology and Landscape Working Group.	Agreed
Other matters as required				
3.7.14	Pre-construction condition surveys	The Applicant provided a response to this matter at Deadline 1 as outlined in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The correct wording is provided in **7.2 Outline Code of Construction Practice [Revision G]** and Paragraph 13.6.6 was corrected in **8.1 Errata List [REP1-071]** as follows: *"Pre-construction condition surveys will be undertaken prior to the construction period..."* The Applicant suggests this matter can be moved to Agreed	Relevant Representation: Paragraph 13.6.6 - LV02 proposes: "Pre-construction condition surveys will be undertaken during the construction period…" This appears contradictory and requires clarification.	Agree
3.7.15	Reinstated Habitat Monitoring	The Applicant provided a response to this matter at Deadline 1 as outlined in **8.4.1 Applicant's Comments on Relevant Representations**	Relevant Representation: Paragraph 13.8.1 - Reinstated habitats are proposed to be monitored for only five years. The Council	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		[REP1-132]. The Applicant considers the five-year monitoring period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects. The monitoring period is adaptive, as stated within **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure. The Applicant also responded to ExQ1 LV 1.4 regarding aftercare in **8.9.1 Applicant's Responses to First Written Questions [REPS-074]** and more recently under Item No.5.1q in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	requests this period be extended to 10 years, consistent with other DCOs and local planning permissions, with management continuing for the lifetime of the scheme.	

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3.8 Socio-economics, Recreation and Tourism

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socioeconomics, Recreation and Tourism assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C],**	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed
EIA - Approach and Methods				
3.8.2	Study area	The Scoping Opinion stated *"The Applicant should seek to agree the study area with the relevant local authorities".* Following meeting held in November 2024, it was agreed that the study area for businesses was expanded from 1km-3km to take into capture potential visual effects on businesses.	Study area was agreed through the meeting held on 14 November 2024.	Agreed
3.8.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C].**	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
3.8.4	Assessment methodology	**6.20 Scoping Opinion [APP-297]** stated *""The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities".*	SNDC confirm their agreement on the matter and note the inclusion of the Review of the Aviation Impact in the ES as requested.	Agreed
3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** The key parameters and assumptions presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed
EIA - Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C].** The baseline conditions and receptors presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to	SNDC's position is that the Waveney Valley Alternative for undergrounding was discontinued and so we feel that the embedded mitigation of the scheme is not sufficient to avoid socioeconomic impacts in the Waveney Valley area.	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		address potential effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC acknowledge and agree with the level of standard mitigation for the project	Agreed
3.8.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC confirm their agreement on this matter, so long as mitigation is flexible to capture local events.	Agreed
EIA - Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C].** This includes an assessment of potential effects on the tourism economy presented in paragraphs 15.7.15 to 15.7.19 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C],**	Having considered the conclusion, SNDC do not agree that the impacts would be negligible adverse and not significant.	Not agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Potential effects on visitor accommodation are outlined in Table 15.22 of the chapter and set out in **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266].** The assessment of effects during construction presented is considered appropriate.		
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 — Socio-economics, Recreation and Tourism [Revision C].** The assessment of effects during operation (and maintenance) presented is considered appropriate.	Having considered the assessment, SNDC agree with the concluded impacts	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [Revision C]** and is considered appropriate for managing construction impacts associated with the Project.	Following review of the revised OCoCP submitted at Deadline 6, SNDC agree with the proposed mitigation measures.	Agreed
Other matters as required				
3.8.13	Skillsand employment plan	In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the host authorities and submitted 8.13	SNDC position is that a Skills and Employment plan was requested and has been provided.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Outline Employment and Skills Plan [REPS-215] into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed.		

3.9 Cumulative Effects

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	SNDC confirm their agreement on this matter.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Approach and Methods				
3.9.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].**	Given additional information subsequently provided by the Applicant, SNDC agree this matter	Agreed
3.9.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.4 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** The key parameters and assumptions presented are considered appropriate.	Given additional information subsequently provided by the Applicant, SNDC agree this matter	Agreed
EIA - Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** The baseline conditions and receptors presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
EIA - Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Section 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC position following review of the ES documents and discussions with the Applicant, this matter is not agreed.	Not Agreed
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in Section 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and set out in **7.2 Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC position following review of the ES documents and discussions with the Applicant, this matter is not agreed. .	Not Agreed
3.9.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B].** Additional mitigation is considered	SNDC position following review of the ES documents and discussions with the Applicant, this matter is not agreed.	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA - Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 17.7 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B].** The assessment of effects during construction presented is considered appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC position following review of the ES documents and discussions with the Applicant, this matter is not agreed.	Not Agreed
3.9.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.7 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SNDC position following review of the ES documents and discussions with the Applicant, this matter is not agreed.	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and is appropriate for managing construction impacts from the Project.	SNDC have raised throughout pre-application and examination of this project that there will be a signficiant cumulative effect due to the number of other schemes within or in close proximity to the order limits. As such, SNDC would expect additional mitigation to be applied for cumulative effects to address this in addition to the embedded and standard mitigation set out in the remainder of the ES and so this matter is not agreed.	Not agreed
Other matters as required				
3.9.13	Large-scale energy infrastructure	Cumulative effects with the Sheringham and Dudgeon Offshore Wind Farm Extensions (EN010109) were assessed within **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284],** assessed under ID DC06 within 6.17.A3. Cumulative effects with East Pye Solar Farm and BESS (EN0110014) were considered within **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283].** This project did not fall within the Zones of Influence for environmental topics; therefore, the project was not assessed further. Cumulative effects with Hornsea Three Offshore Wind Farm (EN010080) were assessed in the inter-project cumulative effects assessment under ID DCO1 within	SNDC provided the following comments in the relevant representations on 27th November 2025: • The Council notes a concentration of large-scale energy infrastructure proposals and consents within South Norfolk and the wider Norwich area, including: — Tasway Energy Park - 700MW Solar and Battery Energy Storage System (BESS) NSIP (Phase One consultation ongoing). — East Pye - 500MW Solar and BESS NSIP (formal submission anticipated in the New Year).	Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		6.17.A3 Environmental Statement Appendix 17.3 Inter Project Cumulative Effects [APP-284]. Updates to timeframes of construction and operation of the other development since the original assessment was undertaken have been considered and updates to the conclusions of the cumulative effects assessment are presented in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163] and 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** submitted at Deadline 4. A further review will be undertaken, and documents will be updated accordingly for issue at Deadline 7 **(6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** and **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C])** if appropriate. The Project has been made aware of Tasway Energy Park since the submission of the Development Consent Order application. The development has been captured and assessed within an updated inter-project cumulative effects assessment, documented in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]**	— Consented and proposed TCPA renewable energy schemes around Norwich Main and along the proposed pylon route. — Orsted Hornsea Project Three Offshore Windfarm NSIP cable routes and converter station northwest of Norwich Main; — Equinor Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (SEP and DEP) cable routes and converter station south of Norwich Main	
3.9.14	Existing pylon network	Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed, as set out in Section 13.5 in **6.13 Environmental Statement**	SNDC provided the following comments in the relevant representations on 27th November 2025: • The existing network of pylons running from Norwich into Suffolk already	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		Chapter 13 - Landscape and Visual [Revision B]. The Applicant provided a response to this matter at Deadline 2 through the relevant representations process as outlined in **Appendix AA of 8.4.1 Applicant's Comments to Relevant Representations [REP2-023].** The cumulative effects of the Project have been assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** which includes cumulative effects on landscape and visual receptors and heritage assets. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	imposes a significant visual presence. The proposed Project will introduce an additional line of pylons in close proximity to the existing network, resulting in two parallel lines dominating the rural landscape. This raises serious concerns regarding: — Harm to rural character and visual amenity; — Adverse effects on the setting of heritage assets.	
3.9.15	Existing Infrastructure	The Applicant acknowledges SNDC's concerns regarding the potential cumulative effects of the Project in combination with other infrastructure development. However, the Applicant considers that these matters have been robustly assessed through the Environmental Statement, including the topic-specific assessments and the cumulative effects assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B].** Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed, as set out in Section 13.5 in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].**	SNDC provided the following comments in the relevant representations on 27th November 2025: The Council is concerned that the cumulative effect of these Projects, together with existing infrastructure, will result in: Landscape and Heritage Harm as a result of industrial-scale infrastructure incompatible with rural character; Ecological Impact as a result of potential loss of habitats and biodiversity. Community Disruption due to noise, disturbance and disruption during construction and operation phases; Economic Consequences due to negative impacts on local businesses and tourism e.g. South Norfolk with its Market Towns of Diss,	Not Agreed

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ID	Matter	National Grid's Position	SNDC's Position	Status
		The assessment also considers cumulative effects arising from other relevant developments in accordance with the agreed methodology. The Applicant does not agree that the cumulative presence of infrastructure development would result in effects beyond those identified in the Environmental Statement, nor that the assessment has underestimated potential impacts on tourism, recreation or the local economy. These matters have been specifically considered within **6.15 Chapter 15 - Socio-economics, Recreation and Tourism [Revision C],** including the potential effects on visitor attractions, recreational routes and local businesses. The Applicant provided a response to this matter at Deadline 2 through the relevant representations process **(8.4.1 Applicant's Comments to Relevant Representations [REP2-023]),** and considers that the assessment provides a robust and proportionate evaluation of likely cumulative effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Harleston, Loddon and Wymondham; numerous Heritage assets including medieval churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes which provide a rich tourism/visitor offer. Any reduction in visitor numbers due to disruption or diminished attractiveness of the area will negatively affect hospitality, retail and cultural sectors.	

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3.10 Development Consent Order

The matters below are still under discussion between both parties.

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A - Draft Development Consent Order, for matters relating to the **3.1 Draft DCO.**

This table contains the views of the Applicant and SNDC up to and including the draft DCO submitted at deadline 5 **[REP5-060].** Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[PD-011],** it has not been possible to include updates to the draft DCO after this iteration.

The Applicant and SNDC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.1	DCO Requirements - Interpretation	The intention of paragraph 1(3) of Schedule 3 to **3.1 Draft DCO [REP5-060]** is to clarify that the Applicant will be in 'accordance' or 'general accordance' with an approved plan if it is in 'accordance' or 'general accordance' with any details that are approved by the relevant discharging authority following a re-submission of a Requirement for discharge. It is not intended to authorise the relevant authority to discharge Requirements that facilitate a material change. Indeed, the management plans to be approved under Requirement 4, for example, must be in substantial accordance with the outline management plans. Likewise, any amendments authorised by the discharging authority under an 'unless otherwise agreed' tailpiece are limited by the need to demonstrate to the relevant authority that the	The Council considers Schedule 3, paragraph 1(3), which allows for amendments approved in writing by the relevant discharging authority, should be more tightly drafted. While the requirement for the authorised development to be carried out "in general accordance with" approved plans or documents provides some flexibility, this cannot be construed as permitting material changes. The phrase "in general accordance with" should be restricted to de minimis variations only i.e. those that do not alter the substance or intent of the approved scheme. The current wording would undermine the certainty and integrity of the consent process, effectively enabling significant departures without proper scrutiny or procedural safeguards.	Not Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		proposed amendment would not result in any materially new or materially different environmental effects to those reported on in the Environmental Statement. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.10.2	DCO Requirements - Construction management plans	The Applicant notes the Council's comment that additional consultees, such as the Local Highway Authority or the Environment Agency, should also be included in relation to the discharge of Requirement 4 (Construction management plans). The Applicant has updated **3.1 Draft DCO [REP5-060]** to include the local highway authority and the relevant highway authority as a named consultee in the context of the strategic road network and the Environment Agency in respect of the code of construction practice. **7.3 Outline Construction Traffic Management Plan [Revision F]** details the engagement with Local Highway Authorities and other stakeholders for any changes within the Outline CTMP. The Local Highway Authority then has 28 days to confirm its consent to the change, to provide reasons why the change is not accepted. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	There is a need for additional consultees. For example, only Natural England is listed in Requirement 4(1) as a consultee for landscape and ecology. Additional consultees should include: • Environment Agency; • Local Highway Authority; • National Highways (where strategic networks are affected). Construction Traffic Management Plans, for example, must be agreed with the Highway Authority and National Highways.	Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.3	DCO Requirements - Stages of authorised development	Given the programme to which the Project has to be delivered, a requirement of a phasing programme for the entire scheme before the carrying out of any pre-commencement operations would be disproportionate and could frustrate the delivery. It is agreed that phasing should be confirmed prior to commencement of construction. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	It is unclear why a phasing plan cannot be required prior to commencement. This would provide clarity and certainty for stakeholders, As currently drafted, Requirement 3(1) and (2) appear potentially contradictory, as activities defined as 'pre-commencement' may themselves constitute development. To avoid ambiguity, the sequence should be revised so that (1) precedes (2), ensuring the phasing plan is agreed before any works begin.	Not Agreed
3.10.4	DCO Requirements - Archaeology	The Applicant has amended **3.1 Draft DCO [REP5-060]** to remove the definition of "discharging authority" and has provided a new two-limb definition of 'relevant planning authority' which removes any ambiguity by making clear that in a two-tier area, the district planning authority is the primary discharging body; and includes a separate definition of "relevant county planning authority" who is named as a consultee where county-level expertise is relevant.	For Norfolk this Requirement falls under the remit of the Historic Environment Service currently the responsibility of the County and which has engaged with National Grid. This matter is considered to be subject to further discussion, SNDC consider that use of the term 'relevant archaeology service' would be more appropriate as the county tier of planning authority do not have a planning remit for archaeology.	Agreed
3.10.5	DCO Requirements - Design and layout plans (elevations)	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft DCO [REP5-060].** The Applicant notes the authority's comment relating to the clarificatory wording in Requirement 6 of the **3.1 Draft DCO [REP5-060],** but does not agree that its inclusion authorises reliance on	The phrase 'general accordance' is unacceptable. In the absence of anything more than illustrative or approximate details, any details submitted as part of the discharge of Requirements must either be in accordance with specific proposals or subject to further approval. The council have asked to be provided with the details of the construction laydown areas and satellite construction compounds. If those details were to be provided, the Council would	Not Agreed

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		paragraph 1 to go beyond minor, non-material adjustments. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	accept 'in general' accordance with to allow for de minimis variations. This narrow reading is reinforced by Requirement 6, which governs design and layout plans (elevations). Requirement 6(1) mandates that the authorised development must be carried out "in general accordance" with the approved design and layout plans, while Requirement 6(2) appears to clarify that any departure resulting in materially new or materially different environmental effects would fall outside this flexibility. Accordingly, the interpretation provision should not be used to justify changes that go beyond minor, non-material adjustments, as doing so would conflict with the express limitation in Requirement 6(2).	
3.10.6	DCO Requirements - Construction hours	The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and further explained why reduced working hours would not be sufficient to deliver this Project by the end of 2030 to DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211].** Requirement 7 (Construction Hours) of the **3.1 Draft DCO [REP5-060]** provides that the proposed core working hours are 07:00-19:00 Monday to Friday and 07:00-17:00 on Saturdays, Sundays, Bank Holidays and other Public Holidays, unless alternative hours are approved by the relevant planning authority.	Current wording allows work on Bank Holidays and Sundays, which is inconsistent with other DCOs. Standard practice is: • Monday-Friday: 07:00-19:00 • Saturday: 07:00-13:00 • No working on Sundays or Bank Holidays Other NSIPs with similar urgency (e.g. Hornsea, Equinor and RWE) have managed delivery without resorting to routine Sunday and Bank Holiday working. If work needs to be carried out outside approved hours, the Applicant can apply for prior consent for construction works under section 61 Environmental Protection Act 1990. It allows the Applicant to apply to the local authority	Not Agreed

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		The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The construction working hours set out in **3.1 Draft DCO [REP5-060]** define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in **7.2 Outline Code of Construction Practice [Revision GJ.**	for prior consent to carry out works that might otherwise cause a statutory nuisance under Part III of the Act. This has been an effective way of managing works needed on Sundays and Bank Holidays in the DCO projects referred to above whilst managing amenity impacts. The requirement should be worded so as to limit the hours but to allow of exceptions where EPA consent is granted. National urgency does not override the principle of reasonable mitigation for local impacts. The National Policy Statement and standard DCO practice require minimising adverse impacts on local amenity. Continuous working would go beyond that which was assessed in the Environmental Statement, introducing unassessed harm.	

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		The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays / bank holidays would materially harm the deliverability of this critical national priority project. **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start-up and close-down activities taking place up to one hour either side of the core hours, and activities which can take place outside the core working hours. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [Revision G],** significant effects from noise and vibration during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [REP5-060]** within the final Code of Construction Practice. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

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3.10.7	DCO Requirements - Retention and removal of trees, woodland and hedgerows	Requirement 4 in Schedule 3 to the **3.1 Draft DCO [REP5-060]** covers **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which does not show all the trees and hedgerows that will be removed by the Project. **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision D]** shows outline landscape proposals for non-linear permanent infrastructure. Conversely, Requirement 8 requires plans showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage to be submitted to and approved by the relevant planning authority, prior to that stage commencing, unless otherwise agreed with the relevant planning authority. These plans can be contained as an appendix to an Arboricultural Method Statement (AMS) which details the works and confirms what protection measures are to be implemented, for example tree protection fencing, tree pruning operations, ground protection and works to be undertaken under arboricultural supervision. The submission of an AMS is secured through the **7.4 Outline Landscape and Ecological Management Plan [Revision G]** and Requirement 4 of the **3.1 Draft DCO [REP5-060].**	Plans showing trees for retention or removal are already submitted for approval as part of requirement 4. It is unclear why this Requirement is needed against that background and context. SNDC accept that these [arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas] will be secured with the detailed design stage of the project.	Agreed
3.10.8	DCO Requirements - Reinstatement planting plan	The reference to 'reinstatement' is to the reinstatement of the land prior to that part of the authorised development being brought into operational use. The drafting makes clear that the latest point at which the reinstatement planting works may be carried out is the first available planting season after the relevant part of the	The Heading to, and the text of Requirement itself should not contain the word "reinstatement" because it should encompass planting plans that may or may not include reinstatement. Requirement 9(4) - term "earliest opportunity" creates ambiguity about in	Not Agreed

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		authorised development is brought into operational use. The Applicant does not consider it necessary to amend the wording of Requirement 9(4). The Applicant may find itself in a situation where it could carry out reinstatement planting in the current planting season, rather than waiting until the next planting season. The Applicant has proposed a five-year replacement period that is consistent with recent National Grid 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. Section 10 (Aftercare) of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** addresses the aftercare procedures. The Applicant notes that a 10-year replacement period is not standard practice for DCOs or planning permissions, where a five-year establishment and replacement period is typically applied and is widely accepted as sufficient to secure successful establishment. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	whose opinion the earliest opportunity may be. It should be defined as the "next planting season" for clarity. Requirement 9(7) - A 10-year replacement period is required to allow establishment, consistent with other DCOs and planning consents. This was agreed under Hornsea following evidence on Norfolk's climate and planting challenges, as a result of the uniquely dry and sandy ground conditions in Norfolk.	
3.10.9	DCO Requirements - Reinstatement schemes	The 21-month period links back to the time period in Article 27 (Temporary use of land by National Grid) and Article 28 (Temporary use of land by UKPN) of **3.1 Draft DCO [REP5-060],** in which the undertaker is not permitted to remain in	The Council doesn't understand why a period of 21 months is provided for. It could be a typo, and the Applicant meant to refer to 12 months, so this should be clarified.	Agreed

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		possession of the land without the consent of the owners after the end of a period of 21 months.		
3.10.10	DCO Requirements - Additional requirements (Construction management plans)	Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G]** includes commitment GG26 to control and minimise construction lighting to reduce disturbance to residential and ecological receptors. On the matter of noise and vibration control, **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]** is provided as an appendix to **7.2 Outline Code of Construction Practice [Revision G]** and contains measures to control and mitigate noise and vibration during construction. Measures to mitigate other potential construction effects upon residential amenity are also set out as commitments within **7.2 Outline Code of Construction Practice [Revision G],** for dust. **7.2 Outline Code of Construction Practice [Revision G]** is secured by Requirement 4 of **3.1 Draft DCO [REP5-060].** Therefore, the Applicant considers that appropriate controls are already secured and additional requirements are not necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	The Council considers that several essential matters have not been adequately addressed within the present suite of Requirements in the Draft DCO and has requested additional or expanded Requirements in relation to • Implementation and maintenance of landscaping; • Contaminated land and groundwater management; • Noise control measures; • Control of critical light emissions.	Not Agreed
3.10.11	DCO Requirements -	Commitment GG22 in **7.2 Outline Code of Construction Practice [Revision G]** secures that	The Council considers that several essential matters have not been adequately addressed	Agreed

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	Additional requirements (Surface water drainage management plan)	the Main Works Contractor(s) will prepare a Surface Water Management Plan. This plan will be substantially in accordance with **8.2 Drainage Strategy DCO [Revision D],** submitted at Deadline 1 **(8.2 Drainage Strategy DCO [REP1-072])** and updated at Deadline 4 **(8.2 Drainage Strategy DCO [REP4-186]),** and would demonstrate how runoff across construction work sites would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes. The drainage mitigation measures described in this strategy are secured by commitments in the **7.2 Outline Code of Construction Practice [Revision G]** via Requirement 4 (Construction Management Plans) of **3.1 Draft Development Consent Order [REP5-060].**	within the present suite of Requirements in the Draft DCO and has requested a Drainage Strategy, including surface and foul water management.	
3.10.12	DCO Requirements - Additional requirements (Fencing and means of enclosure)	Commitment GG29 in **7.2 Outline Code of Construction Practice [Revision G]** commits to appropriate fencing. The type of fencing installed will depend on the area to be fenced and will take into consideration the level of security required in relation to the surrounding land and public access, rural or urban environment and arable or stock farming. Permanent fencing is addressed in **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP5-166],** Given the scale and length of the Project, it would be a disproportionate administrative and practical burden on the Applicant and the relevant authority to include a requirement for discharge relating to something so specific as temporary fencing and	The Council considers that several essential matters have not been adequately addressed within the present suite of Requirements in the Draft DCO and has requested additional or expanded Requirements in relation to Fencing and Means of Enclosure (including temporary construction compounds).	Not Agreed

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		means of enclosure. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.10.13	DCO Requirements - Additional requirements (Skills and employment plan)	As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** the Applicant has engaged with the host authorities and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The commitment to implementing the project in accordance with the Employment and Skills Plan has been secured by way of a DCO Requirement (Requirement 15) in **3.1 Draft DCO [REP5-060].**	SNDC note that a Skills and Employment plan was requested and has been provided.	Agreed
3.10.14	DCO Requirements - Applications made under requirements	The principle of deemed discharge provisions in relation to the discharge of Requirements is not unique to this Project. The principle has precedent in The National Grid (Bramford to Twinstead Reinforcement) Order 2024. It is essential that a project of this scale and critical national importance incorporates these deemed approval provisions to ensure that matters outside of the Applicant's control do not unnecessarily frustrate the delivery of the Project. The deemed discharge	The Council objects to the inclusion of Schedule 4, Requirement 1(2) within the draft DCO, which introduces a mechanism to allow certain requirements to be treated as approved if the relevant authority does not respond within a specified timeframe. The originally proposed 28-day period for discharge is, in the Council's view, unrealistic and unworkable. This is a major issue for the council. Faced with that unrealistic	Not Agreed

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		provision in Schedule 4 paragraph 1(2) of **3.1 Draft DCO [REP5-060]** is subject to the caveat in sub-paragraph (3), which ensures that if the application is accompanied by a report that considers it likely that the subject matter of the application is to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement, then the application is deemed to have been refused by the relevant authority at the end of that period. The draft DCO does not include any Requirements directly relating to highway safety. Instead, highways matters are to be governed by the protective provisions in Part 4 and Part 5 of Schedule 16 to the draft DCO. The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed	timeframe, the Council may be put in a position where it has no option but to refuse an application for discharge. The Council requires a minimum of 8 weeks/56 days to discharge requirements. Noting the change from 28 days to 25 business days proposed by the Applicant, this is still considered to be wholly inadequate, is unjustified when judged against statutory norms in this and other contexts (8-16 weeks) and is particularly inadequate given the need for consultation with prescribed bodies.	|||HB|

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		to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft DCO [REP5-060]** to extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.15	DCO Requirements - Further information	A standalone consultation or initial review period of 21 days would have a considerable impact on the time it takes relevant authorities along the entire length of the route to discharge Requirements and could frustrate the delivery of the Project. The Applicant has updated **3.1 Draft DCO [REPS-060]** to replace the five-day period for the request of further information to five 'business days' for consistency of terminology. This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21-day period for notification of further information requested by a requirement consultee with an equivalent period of 15 'business days'. Paragraph 2(4) of Schedule 4 to **3.1 Draft DCO [REP5-060]** allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	As to the periods of consultation: Prescribed consultees typically require 21 days for initial consultation with further consultation often necessary. Complex applications often necessitate further consultation, particularly where specialist input is required (e.g. environmental health, ecology, heritage). A five-day window in Schedule 4, Requirement 2, paragraphs (2) and (3) does not allow sufficient time for: • Reviewing technical documentation. • Liaising with internal specialists. • Identifying gaps or requesting additional information. The requirement should be amended to allow a minimum of 21 days for initial review, with flexibility for further consultation where necessary.	Not Agreed

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.16	DCO Requirements - Fees	The Applicant has updated the proposed fee to align with the current national guidance in **3.1 Draft DCO [REP5-060].** The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	The proposed fixed fee of £145 is outdated. As of April 2025, the national fee for discharge of conditions is £298. Fees should align with the national fee schedule and refund provisions should reflect national practice.	Agreed

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Appendix A.
Draft DCO Wording

nationalgrid

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Appendix A
Draft DCO Wording

This table contains the views of the Applicant and SNDC up to and including the draft DCO submitted at deadline 5 **[REP5-060].** Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[RD-011],** it has not been possible to include updates to the draft DCO after this iteration.

The Applicant and SNDC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

Table A.1 South Norfolk District Council - Comments on the draft DCO

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
1.	DCO Wording - Change in government structure	The Applicant has updated its definition of "relevant planning authority" to future proof the drafting in **3.1 Draft DCO [REP5-060],** The Applicant's approach: (i) removes any ambiguity Norfolk County Council has identified, by making clear that in a two-tier area the district planning authority is the primary discharging body; (ii) retains a separate 'relevant county planning authority' definition, enabling requirements to specify county-level consultees expressly; and (iii) avoids complications for any other authorities within the Order Limits that are, or may become, unitary or metropolitan district authorities, for whom Norfolk County Council's proposed 'relevant district planning authority' definition would not be appropriate. Limb (b) of the Applicant's definition captures those single authority scenarios without requiring	Future Governance Changes: Norfolk (and Suffolk and Essex) is part of the accelerated Local Government Review, meaning the current two-tier system will likely be replaced by unitary authorities before requirements are discharged. Wording must be future-proofed. SNDC query the terminology 'relevant county planning authority' with reference to the Relevant Representations, Local Impact Report, and ExQ1 Response.	Agreed

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		an exhaustive schedule of which councils are unitary, which would be unusual and unwieldy on the face of the DCO. The general principle the Applicant would apply is that: (i) the 'relevant planning authority' (per the new two-limb definition) would be the primary discharging body throughout the Requirements; and (ii) 'relevant county planning authority' will be named expressly as a consultee where county-level expertise is relevant (e.g. archaeology, flood risk, construction surface water drainage), with Requirements amended to read 'following consultation with the relevant county planning authority'. Where local government reorganisation results in more than one successor authority across a current given area, the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is optimally structured from a statutory drafting perspective to address this. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case.		

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		The reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.		

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ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
2	DCO Wording - Discharging Authority	The Applicant has updated its definition of "relevant planning authority" in **3.1 Draft DCO [REP5-060].** The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	Discharge Authority: The Council recommends that the Local Planning Authority be designated as the discharge authority for all planning-related matters.	Agreed
3	DCO Wording - Consistency of terminology	The Applicant has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has provided business day equivalent periods for the timeframes used in the **3.1 Draft DCO [REP5-060].**	Inconsistent use of 'days' and 'business days' for timescales creates confusion; suggest that terminology is standardised.	Agreed
4	DCO Wording - Limits of Deviation	While the Limits of Deviation provide some flexibility in design for the detailed design stage, the Project commitments to avoid key features apply (including ancient woodland and veteran trees) and will act as constraints to the detailed design phase, commitments are outlined within **7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G].** **7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms that, following detailed design and prior to construction, relevant surveys would be	The limits of deviation (LCD) should be drafted to avoid impacts on veteran trees and A3 woodland and must avoid the area. Following the amendments by the applicant to Articles 50 (felling and lopping) and 51 (trees subject to tree preservation orders) to ensure clear protections for veteran trees, SNDC agree this matter.	Agreed

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		undertaken to reduce removal of trees/hedgerows as far as practicable, and this is secured by commitment GG14 **in 7.2 Outline Code of Construction Practice [Revision G].** This relates to all trees and includes the veteran tree in proximity to Pylon 33. In addition, **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D]** contains information on individual veteran trees. **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision D]** includes information on individual veteran trees. Currently the area of woodland within the Tas Valley is not classified as ancient woodland on the Natural England Ancient Woodland Inventory (AWI). Habitat surveys of this woodland did not identify the woodland ground flora as indicating the presence of ancient woodland and therefore is not considered irreplaceable habitat in line with guidance. Given the controls noted above, the Applicant does not consider it necessary to amend the drafting of Article 5 of **3.1 Draft DCO [REPS-060],** the Applicant will amend Articles 50 (felling and lopping) and 51 (trees subject to tree preservation orders) to ensure clear protections for veteran trees.		

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5	DCO Wording - Limits of Deviation	The limits of deviation in Article 5 of the draft DCO **(3.1 Draft DCO [REP5-060])** are subject to the commitments contained in **7.4 Outline Landscape and Ecological Management Plan [Revision G] and 7.2 Code of Construction Practice [Revision G].** The Applicant does not consider it necessary to amend the wording of Article 5 of the draft DCO.	The Council has concerns about the current scope of Article 5 where it enables deviations that would result in the loss of irreplaceable habitats. These impacts are contrary to national policy and cannot be adequately mitigated. Robust restrictions and requirements must be included in the DCO to protect these sensitive ecological assets. In light of the applicant not considering it necessary to amend, this matter is therefore not agreed.	Not agreed
6	DCO Wording - Precision of language	The Applicant agrees with the authority that it is important for **3.1 Draft DCO [REP5-060]** to be clear, robust and practical to enable the efficient delivery of the Project. The Project will be delivered by the Great Grid Partnership (GGP) - a new delivery mechanism for National Grid's Accelerated Strategic Transmission Investment (ASTI) projects, established to support the timely and coordinated delivery of nationally important electricity transmission infrastructure. Under this model, the team responsible for taking the Project through detailed design and construction, including the principal works contractors, has already been appointed. This team has had the opportunity to review the Development Consent Order (DCO) application and associated environmental and technical documentation in full prior to submission, ensuring that the Project is well understood by those who will be responsible for its delivery. This approach reflects the scale, urgency and strategic importance of ASTI	It is critical to recognise that the National Grid team responsible for pre- application and examination will not manage post-consent implementation. Instead, a separate team will rely entirely on the wording of the DCO consent. Contractors appointed post-consent often seek changes to agreed management plans (e.g. working hours) due to unforeseen issues or programme constraints. This underscores the need for clear, robust and practical drafting at the outset. SNDC note that the applicant agrees with the LA and therefore this matter can be agreed.	Agreed

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		projects and is intended to ensure that the Project can move efficiently into construction as soon as development consent is granted, without the delay that can arise from post-consent procurement or contractor familiarisation. The GGP model also supports a consistent approach to delivery, drawing on shared experience, common standards and best practice across the ASTI portfolio. This consistency helps to: • Drive quality in design, construction and environmental management • Ensure alignment with the assumptions and commitments set out in the DCO and Environmental Statement • Reduce delivery risk through early contractor involvement and integrated team working. Overall, the GGP approach provides a robust framework for delivering ASTI projects at pace, while maintaining high standards of safety, quality and environmental performance, and reflects the urgent national need to strengthen the electricity transmission network.		
7	DCO Wording - Statutory Nuisance	The Main Works Contractor(s) are committed to undertaking detailed construction noise and vibration assessments by commitment NV05 within **7.2 Outline Code of Construction Practice [Revision G].** These assessments will be based on the specific proposed construction methodologies for each works activity and location. Specific mitigation measures will be determined by the Main Works Contractor(s) based on the outcome of these assessments.	3.1.14 The inclusion of a provision granting immunity from prosecution requires careful consideration. If such a provision were to be included, it should be strictly limited to circumstances where the undertaker has demonstrably taken all reasonable measures to prevent noise and vibration nuisance. 3.1.15 The Council's position remains that immunity from prosecution should not be	Not agreed

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		The mitigation measures identified will be detailed in the Noise and Vibration Management (NVMP), which will be updated from the outline **NVMP (7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]).** The Main Works Contractor(s) is committed to employing best practicable means (BPM) by commitment NV01 within **7.2 Outline Code of Construction Practice [Revision G]** (Outline CoCP). The Outline CoCP and outline NVMP (or subsequent CoCP and NVMP) do not themselves grant immunity; rather, they secure the requirement that BPM must be applied and documented, which is the legal basis for any immunity. Additionally, some aspects of construction noise and vibration may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, through consultation between the Main Works Contractor(s) and the Local Planning Authority, as detailed in the Noise and Vibration Management Plan **(7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision D]).** This same principle has been proposed on other recent National Grid projects, including Bramford to Twinstead and Sea Link. Further, this article is based on article 7 of the general model provisions, with the removal of references to section 65 of the Control of	incorporated within the DCO. The existing legislative framework under COPA already affords a statutory defence where National Grid can demonstrate the use of Best Practicable Means (BPM). Where works are undertaken pursuant to a Section 61 consent, noise levels and durations can be conditioned and any breach of those conditions remain enforceable. In such cases, BPM again constitutes a valid defence against prosecution. SNDC maintain the view that the immunity is not required as this would be double regulation and therefore is not agreed, However, this is for the inspectorate to decide.	

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		Pollution Act 1974, following its repeal, and mirrors article 45 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. It amends, in respect of noise only, the more general statutory defence afforded by section 158 of the Planning Act 2008. This provision is appropriate for inclusion 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 the Order is made, will have been found to be acceptable on the terms of the Order and its Requirements.		

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4. Confirmation of Agreement

The above SoCG is agreed between National Grid and South Norfolk District Council on the date specified below.

Signed for and on behalf of National Grid:

DocuSigned by:

[redacted]

Date:

20/07/2026

Signed for and on behalf of South Norfolk District Council:

[redacted]

Date:

21/07/2026

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Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SNDC	South Norfolk District Council
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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